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ABSTRACT

This report contains the final results of the United States Commission on Civil Rights' investigation of race and ethnic discrimination in federally assisted programs for older persons. The investigation was the result of allegations that the minority elderly were not being served by Older Americans Act programs. The information reported was obtained by questionnaires mailed to all State, area, and territory agencies on aging and from personal interviews with program administrators at the Federal level. Information on employment data covers minority representation, bilingual staffing, affirmative action programs, the handling of discrimination complaints, and Administration on Aging's enforcement of policies and practices. Data on participation of minority organizations and firms in Title III and Title IV of the Older Americans Act are analyzed in a discussion of representation, outreach efforts, and monitoring and compliance activities. Monitoring and evaluation of minority participation in Older Americans Act service programs, outreach efforts (especially bilingual ones), and barriers to participation are also discussed. Although the Commission's investigation did not document discrimination against minorities, governmental policies and practices were found to adversely affect minority participation in the programs. Recommendations for legislative change and for changes in the Administration on Aging are made. Appended are a glossary of terms, a summary of findings from phase I of the investigation, and a description of methodology, including copies of the questionnaires. (CMG)

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ED235266

Minority Elderly Services New Programs, Old Problems

Part II

A Report of the United States
Commission on Civil Rights

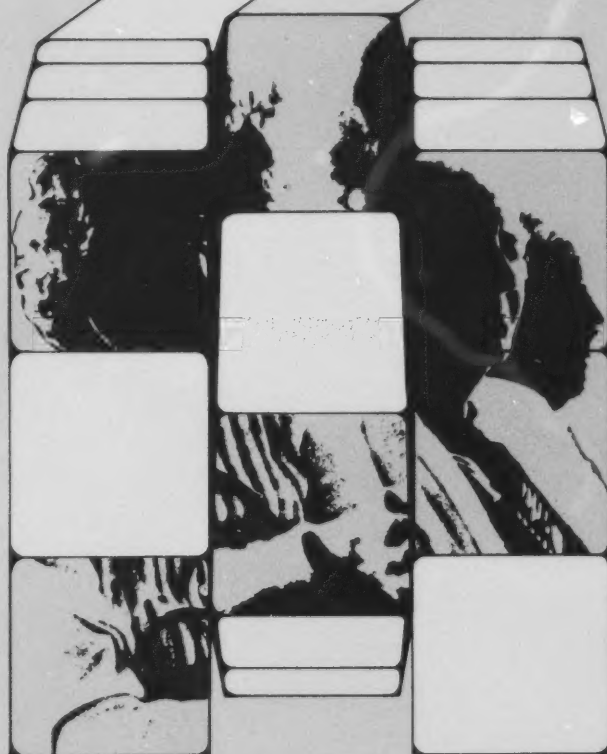
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U.S. COMMISSION ON CIVIL RIGHTS

The U.S. Commission on Civil Rights is a temporary, independent, bipartisan agency established by Congress in 1957 and directed to:

- Investigate complaints alleging that citizens are being deprived of their right to vote by reason of their race, color, religion, sex, age, handicap, or national origin, or by reason of fraudulent practices;
- Study and collect information concerning legal developments constituting discrimination or a denial of equal protection of the laws under the Constitution because of race, color, religion, sex, age, handicap, or national origin, or in the administration of justice;
- Appraise Federal laws and policies with respect to discrimination or the denial of equal protection of the laws because of race, color, religion, sex, age, handicap, or national origin, or in the administration of justice;
- Serve as a national clearinghouse for information in respect to discrimination or denials of equal protection of the laws because of race, color, religion, sex, age, handicap, or national origin;
- Submit reports, findings, and recommendations to the President and the Congress.

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John Hope III, *Acting Staff Director*

LETTER OF TRANSMITTAL

November 1982

THE PRESIDENT

THE PRESIDENT OF THE SENATE

THE SPEAKER OF THE HOUSE OF REPRESENTATIVES

Sirs:

The U.S. Commission on Civil Rights presents this report to you pursuant to Public Law 95-478.

This document presents the results of the Commission's examination of racial and ethnic discrimination in federally assisted programs for older persons mandated by Title III of the 1978 amendments to the Older Americans Act. The report is published in two parts. Part I contains the results of case analyses of six communities across the Nation sent to you in July 1982. Part II contains the results of analyses of data obtained by the Commission from staff interviews at the Administration on Aging and mail questionnaires to program administrators at the State and local level.

The data collected in both phases of the Commission's investigation reveal that the policies and practices generally followed by Administration on Aging officials, State units on aging, area agencies on aging, and service providers in employment, contracts, and services adversely affect minority participation in Older Americans Act programs. Despite the fact that minorities can be found among program participants as employees, grantees, and service recipients, full participation by minorities is a right yet to be realized. It is evident that congressional concern regarding the lack of minority participation in Older Americans Act programs is justified.

Based on the Commission's investigation of Older Americans Act programs and its finding of limited participation by minorities, the Commission questions the efficacy of removing statutory

provisions and sections of the act in 1978 that referred explicitly to the inclusion of minorities in Older Americans Act programs. The Commission strongly urges that legislation be reinstituted clearly evidencing congressional intent that minorities participate fully in available Older Americans Act programs. Such legislation needs to be supported by regulations and program directives by the Administration on Aging specifically providing for full minority participation.

We urge your consideration of the facts presented and the Commission's recommendations for corrective action.

Respectfully,

MEMBERS OF THE COMMISSION

Clarence M. Pendleton, Jr., *Chairman*

Mary Louise Smith, *Vice Chairman*

Mary F. Berry

Blandina Cardenas Ramirez

Jill S. Ruckelshaus

Murray Saltzman

John Hope III, *Acting Staff Director*

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The report was prepared under the overall supervision of Caroline Davis Gleiter, Assistant Staff Director, Office of Program and Policy Review.

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Chapter 1

Introduction

In October 1978 Congress amended the Older Americans Act of 1965.¹ Title III of the 1978 amendments mandated that the U.S. Commission on Civil Rights:

- (1) undertake a comprehensive study of discrimination based on race or ethnic background in any federally-assisted programs and activities which affect older individuals; and
- (2) identify with particularity any such federally-assisted program or activity in which evidence is found of individuals or organizations who are otherwise qualified being, on the

¹ Responding to the call for a national program of services to improve the condition of life for all older persons, in 1965 Congress passed the Older Americans Act. The act was one of the first major attempts by the Federal Government to address the social service needs of all older persons on a national level. Older Americans Act, Pub. L. No. 89-73, 79 Stat. 218, as amended, 42 U.S.C. §§3001-3057g (1976 and Supp. III 1979). Over the years, the act has been amended several times, furthering efforts to provide a comprehensive program of social services for older persons. Under the 1978 amendments, grants are made to States to provide nutrition services (both congregate and home-delivered meals), multipurpose senior centers, and a comprehensive array of social services to older persons. Every State must have a State unit on aging, which is responsible for the planning, development, and coordination

basis of race or ethnic background, excluded from participation in, denied the benefits of, refused employment or contracts with, or subject to discrimination under, such program or activity.²

The mandate for the Commission's study of racial and ethnic discrimination in federally assisted programs for older persons, in part, emanated from a Commission finding in its earlier age discrimination study that indicated that older members of minority groups³ were often victims of age as well as racial or ethnic

of services for older persons. Most States also are served by area agencies on aging. Comprehensive Older Americans Act Amendments of 1978, Pub. L. No. 95-478, §103(a)(2), 92 Stat. 1513, 1516, 1558. The revised Title III is codified at 42 U.S.C. §§3021-3030 (Supp. III 1979). The Administration on Aging is the managerial focal point for Federal program activity under the Older Americans Act. In FY 80 the Administration on Aging had 10 regional offices and 57 State units on aging (including the District of Columbia, Puerto Rico, Guam, Samoa, the Pacific Island Trust Territory, and the Northern Mariana Islands); there were 654 area agencies on aging. For further discussion of the act and its provisions see U.S., Commission on Civil Rights, *Minority Elderly Services—New Programs, Old Problems, Part I* (June 1982), chap. 2.

² 42 U.S.C. §1975c Note (Supp. III 1979).

discrimination. That age discrimination study concluded: "Program administrators are not taking sufficient steps to take into account the multiple problems faced by many [minority] older persons and to increase their opportunities for obtaining needed services and benefits."⁴

The mandate for this study also resulted from public testimony at the hearings on passage of the 1978 amendments to the Older Americans Act. Included in this testimony were complaints about the programs' inadequate service to older minorities.⁵ Persons testifying before the Congress charged that Older Americans Act programs followed policies and practices that effectively denied minori-

³ The size of the American population over 60 years of age has risen by 50 percent over the last two decades. The total population 60 years and over in 1960 was 23,702,000; in 1980, 35,630,000. In the past 20 years, the number of older persons in the American population who are minorities (i.e., American Indians/Alaskan Natives, Asian and Pacific Island Americans, blacks, or Hispanics) has more than doubled. In 1960 the minority population 60 years and older numbered 1,847,000, whereas by 1980 estimates indicated that the minority population 60 years and older was 3,712,000. Racially, these data are only available for black, white, and other. The respective population figures are 2,957,000; 31,918,000; and 755,000. U.S., Department of Commerce, Bureau of the Census, *Statistical Abstract of the United States: 1981*, table 29, p. 26.

⁴ U.S., Commission on Civil Rights, *The Age Discrimination Study* (December 1977), p. 26. The Commission also conducted the age discrimination study as a result of a mandate from Congress. The Age Discrimination Act of 1975 included a provision which mandated that the Commission investigate instances of age discrimination in the delivery of services supported by Federal funds, identify examples of age discrimination in such programs, and provide recommendations for the development of regulations for the Age Discrimination Act of 1975. Pub. L. No. 94-135, 89 Stat. 713, 731 (codified at 42 U.S.C. §6106 (1976)). The 1975 Age Discrimination Act,

ties the full benefit of the programs.⁶ Organizational representatives and individuals spoke further of the special needs of some older limited-English-speaking minorities and of Older Americans Act programs' failure to meet these needs.⁷ Testimony before the Subcommittee on Select Education of the House of Representatives noted cases where language and cultural barriers impeded older minorities from obtaining needed service information.⁸ After hearing the allegations that minority older persons were not being served by Older Americans Act programs, Congress ordered the U.S. Commission on Civil Rights to investigate their validity.⁹

part of the 1975 amendments to the Older Americans Act, made unlawful unreasonable discrimination on the basis of age in the delivery of services supported in whole or in part by the Federal Government. Pub. L. No. 94-135, 89 Stat. 713, 728 (codified at 42 U.S.C. §§6101-03 (1976)).

⁵ *Proposed Amendments to the Older Americans Act: Hearings on S. 2850 Before the Subcommittee on Aging in the Senate Committee on Human Services*, 95th Cong., 2d sess. (1979), pp. 420-679 (hereafter cited as *Senate Testimony*).

⁶ *Ibid.*, pp. 420-679.

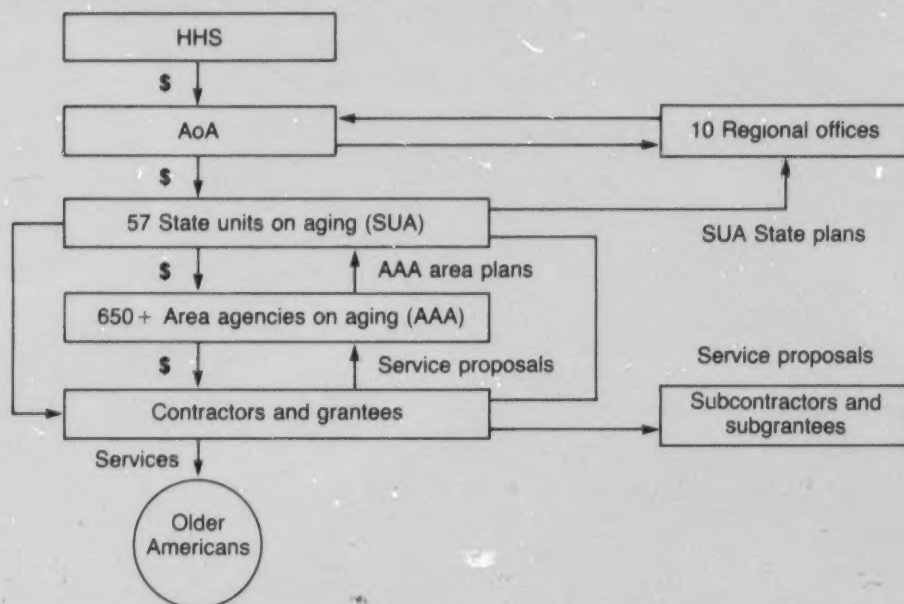
⁷ *Ibid.*, pp. 642-79.

⁸ *Proposed Extension of the Older Americans Act of 1965 and Oversight on the Age Discrimination Act of 1975: Hearings Before the Subcommittee on Select Education of the House Committee on Education and Labor*, 95th Cong., 2d sess. (1978), pp. 244-87.

⁹ Pub. L. No. 95-478, Title III, 92 Stat. 1513, 1554-55 (codified at 42 U.S.C. §1975c note (Supp. III 1979)). Although Congress mandated that the allegations of discrimination against minorities in Older Americans Act programs be investigated by the Commission, it deleted several statutory provisions and sections of the law that referred explicitly to inclusion of minorities in Older Americans Act programs. See U.S., Commission on Civil Rights, *Minority Elderly Services—New Programs, Old Problems, Part I* (June 1982), chap. 2. However, Title VI of the Civil Rights Act of 1964, which prohibits discrimina-

DIAGRAM 1.1

Provision of Services to Older Persons Under the Older Americans Act



In response to this charge from Congress, the Commission investigated, in two phases, minority participation in Older Americans Act programs.¹⁰ In

tion in any programs or activities receiving Federal funding, gives responsibility to the Federal agency administering the funds to ensure nondiscrimination in its federally assisted programs for older persons. 42 U.S.C. §2000d (1970).

¹⁰ The Commission designed a two-phase study. The results of the study are being published in two parts. Part I includes the six case analyses that provide indepth examination of operations of Title III Older Americans Act programs in Cleveland, Ohio; Bridgeport, Connecticut; Tucson, Arizona; Tulsa, Oklahoma; San Francisco, California; and Honolulu, Hawaii. (See app. B for a summary of the city findings.) The results of Part II, which are published here, include data analysis of the State units on aging and area agencies on aging questionnaires and the results obtained from interviews with Federal Administration on Aging officials. The survey results

both phases the Commission's investigations focused on programs funded under Title III of the Older Americans Act and administered by the Administration on

provide an aggregate assessment of minority participation in State units on aging and area agencies on aging programs and thus supplement the case analysis findings. In the interest of minimizing repetition in Parts I and II of the report, only a brief introduction is offered here. For a more complete review of the Federal role in provision of services to older persons and a history of the Commission's mandate, the reader should see chapter 2 of Part I of the study. The findings and recommendations for the entire study (Parts I and II) are published at the end of this segment of the report so that they may reflect the results of the case analyses and the national data analysis.

Aging.¹¹ Phase II also covered the Administration on Aging's award of Title IV monies.¹² In both phases the Commission sought to assess: (1) whether and in what capacities minorities are employed under the Older Americans Act programs for older persons; (2) whether and to what extent minority firms and organizations are awarded Title III funds under the programs;¹³ and (3) whether and to what extent minority older persons receive services under these programs.¹⁴

Phase I involved onsite visits to Title III-funded programs in six cities; Phase II, a mail survey to all State units on aging and area agencies on aging. Through indepth examination of the operations of these programs in both phases, the Commission sought to assess minority participation both at the local level and nationally. Results of the Commission's six-city investigation indicated that in most of the six communities some minorities were included among Older Americans Act program participants as area agency on aging employees. Rarely,

¹¹ 42 U.S.C. §§3030d, 3030f (Supp. III 1979). Title III funds are allocated under Title III-B and Title III-C. Title III-B provides funds for social services, and Title III-C provides funds for congregate and home-delivered meals. Although Title III programs were the Commission's focus, an area agency on aging's budget often includes service programs funded with other Federal monies and also State and local monies.

¹² Title IV monies are awarded by the Administration on Aging for training, research, and discretionary projects and programs. Monies awarded for training are designed to help meet critical shortages of adequately trained personnel for programs in the field of aging. Monies awarded for research and discretionary projects and programs are used to design and evaluate methods to improve the quality of services to the elderly. 42 U.S.C. §§3031-3037 (Supp. III 1979). Since these awards are made at the Federal level, they were not covered in Part I of the study.

however, did minority involvement reflect their representation in the population. Almost all of the area agencies on aging had affirmative action plans, although they generally were a part of a larger municipal affirmative action plan. In almost all of the cities, minority firms received only a small percentage of Title III contract funds from the area agencies on aging, in spite of the fact that such firms often were in a position to render unique services and had displayed the ability to provide services effectively and achieve Title III objectives.

In almost every city minority older persons were being underserved. Black elderly were among program participants in almost all of the cities, but usually in very small numbers. Older Hispanics also were participating, although in inconsequential numbers. Often, despite their representation in a city's population, American Indian and Asian and Pacific Island American elderly were virtually absent from service programs.¹⁵ Although older minorities participated to some extent in all Title

¹³ In this report the term "Title III-funded organization" is used in lieu of "contractor or grantee." See app. A, glossary, for the definition of the terms "Title III-funded organization," "contractor/grantee," and "subcontractor/subgrantee."

¹⁴ Unfortunately, the data collected in the mail surveys did not permit this determination on a national level. It was discovered that reliable participation statistics often were not available by race and ethnicity.

¹⁵ The design for the study also called for coverage of Euro-ethnic Americans. Once field work began, the Commission discovered that it was often impossible to obtain information on the employment or award of Title III funds to Euro-ethnic Americans. Almost without exception, these data were nonexistent. Also, statistics on participation by Euro-ethnic older persons were

III programs, there were some services (e.g., in-home services, legal services) in which they were consistently absent across all six cities. Although findings regarding minority participation in the area agencies on aging programs were very similar for all cities visited, the Commission also discovered that each city has its own special characteristics.¹⁶

This report contains the final results of the second phase of the Commission's investigation of race and ethnic discrimination in federally assisted programs for older persons. It includes the results of data analysis from the State unit on aging and area agency on aging questionnaires and Administration on Aging interviews,¹⁷ integrating these results with those of Part I of the study, the case analyses. The data collected in the six cities suggest that the policies and practices followed by those area agencies on aging and their contractors adversely affect minority participation in Title III-funded programs; the data in this part of the report allow the Commission to evaluate the situation on a more comprehensive basis. It contains conclusions, findings, and recommendations for both segments of the report.

not separated from those of persons of other European descent. In most instances neither the area agency on aging nor its service provider had data on Euro-ethnic participation and thus, efforts to include this group in the study had to be abandoned.

¹⁶ See app. B for short summaries that highlight the findings in each of the six cities visited. Each city summary reports Commission findings regarding minority employment and receipt of grants, contracts, and services.

¹⁷ It is Commission policy to allow affected agencies to review a draft of the final report for accuracy prior to publication. In accordance with the affected agency review policy, a copy of this report was submitted to the Administration on

Because there is minimal information on minority participation in federally assisted programs for older persons, the methodology for Phase II was designed to obtain these data through questionnaires mailed to State and local agencies that administer the aging programs. Information from these questionnaires was used to identify the principal features of federally assisted programs for older Americans as they affect racial and ethnic minorities. In addition, the Commission hoped to obtain data on the types and levels of services available to older minority persons and thus to assess possible program inequities.¹⁸

Two different mailed questionnaires were developed to solicit information on such topics as program staff patterns, affirmative action efforts, the extent of minority participation in program planning, provision of services to minorities, and identity of contractors and criteria for their selection. Questionnaires were sent to all 50 State units on aging plus those for the seven territories and all area agencies on aging (more than 600).¹⁹

Personal interviews were conducted with program administrators at the Federal level. These interviews were used to

Aging (AoA) for its response. The report was mailed to AoA on July 15 with comments due by August 6. Subsequently, AoA requested and was granted two extensions—the first until August 13 and the second until August 30. When the Commission had not received AoA's response by September 2, a decision was made to publish the report.

¹⁸ Data obtained from the area agencies on elderly participation in service programs did not permit evaluation of minority receipt of services. See app. C, methodology, for a discussion of the problems encountered with these data.

¹⁹ Virginia was the only State that did not respond, while over 400 area agencies returned their questionnaires. See app. C.

provide more indepth information on the issues raised in the mailed survey and to elicit information on the Administration on Aging's monitoring of program operations regarding minority participation.²⁰ Using mailed questionnaires to area agencies and State units on aging, the Commission was able to supplement its indepth examination of the operations of programs in the six cities.²¹ The results of the data analysis, when integrated with those from the case analyses, enabled the Commission to determine whether minorities are employed in decisionmaking positions within these programs, whether minority organizations receive contracts, and some of the factors that appear to affect these items.

Following this chapter are three chapters detailing the results of the data analyses of the State and local surveys and Federal interviews. Chapter two discusses employment data obtained from the questionnaires and interviews and describes the number and types of positions held by minorities at the Federal, State, and local levels. It also discusses bilingual staffing and affirmative action programs on all three governmental levels and their effect on minority employment. It concludes with an examination of the handling of discrimination

complaints and Administration on Aging enforcement policies and practices.

Chapter three examines the participation of minority organizations and firms in the Title III and Administration on Aging Title IV contract and grant programs. It discusses the number and amount of awards received by minority organizations and outreach efforts made at the local, State, and Federal levels to increase minority participation. It also discusses monitoring and compliance activities at all three levels of contracts and grants and the resulting effect on minority participation.

Chapter four describes monitoring and evaluation of minority participation in Older Americans Act service programs by Federal, State, and local authorities. It examines the provision of technical assistance by Federal, State, and local program administrators in an effort to increase minority participation, as well as the extent of minority participation on advisory councils. It looks at program outreach efforts for minorities, with special attention focused on the use of bilingual outreach materials. Barriers to minority elderly participation, as perceived by program administrators, are also described.

Conclusions, findings, and recommendations are presented in chapter five.²²

²⁰ See app. C for a complete discussion of the Phase II methodology.

²¹ The surveys were developed by Commission staff in consultation with specialists in the field of aging and were subsequently revised after consultation with Office of Management and Budget and Administration on Aging personnel regarding availability of needed data. Following Office of Management and Budget approval, questionnaires were field tested at selected area and State agencies across the Nation. Questionnaires were then mailed to all State and area agencies. See app. C.

²² The 1978 amendments to the Older Americans Act also authorized a 1981 White House Conference on Aging to develop a comprehensive national policy for older persons. This conference was held in November 1981. The final report from this conference (see, *Final Report, the 1981 White House Conference on Aging* (3 volumes) June 1982), published by the Administration on Aging, makes only minimal reference to the Conference's examination or coverage of the specific needs of minority older persons. Nor does

Appendix A is a glossary of selected terms used throughout the report. Appendix B summarizes the findings for the six cities covered in Part I. Appendix C the report offer significant recommendations for specific methods to increase minority participation in federally assisted programs.

describes the methodology for Part II. Copies of the questionnaires are included at the end of the methodology.

Chapter 2

Minority Employment in Programs Funded Under the Older Americans Act

Title III of the 1978 amendments to the Older Americans Act mandated, in part, that the U.S. Commission on Civil Rights' study of Older Americans Act programs include an examination of employment opportunities within the programs.¹ Accordingly, this study presents data on the employment of minorities in programs funded under the Older Americans Act.²

Investigation of the status of minority employment in Older Americans Act programs in six cities provided evidence that minorities were not being fully utilized at all employment levels by area agencies on aging.³ In the six communities, minorities were almost completely absent from decisionmaking positions. Representatives from each of the minori-

ty communities expressed the opinion that having minorities in key positions in agencies on aging is critical to development of programs for the special needs of minority older persons. The study of six communities also provided evidence that the lack of minority employees in Older Americans Act programs can have an adverse effect on minority participation in the programs.

This chapter examines whether and in what capacities minorities are employed in the agencies established to manage, finance, and develop programs for older persons. The chapter also discusses the effect of the Administration on Aging's policies on employment in State units and area agencies on aging. Employment of bilingual staff is examined, and ques-

community identified the absence of Asian and Pacific Island Americans among program staff who could provide bilingual services as a major barrier to services for older Asian and Pacific Island Americans. Presentation of Sandra Ouye, Kimochi, Inc., in U.S., Commission on Civil Rights, *Civil Rights Issues of Asian and Pacific Americans: Myths and Realities* (1971), pp. 682-83.

³ U.S., Commission on Civil Rights, *Minority Elderly Services—New Programs, Old Problems, Part I* (June 1982) (hereafter cited as *Minority Elderly Services*).

¹ See chap. 1 above.

² Research studies have documented that the inclusion of minority staff in social service programs helps to increase the participation of minorities within the programs. Bell Duran, Patricia Kasschua, and Gail Zellman, *Delivering Services to Elderly Members of Minority Groups—A Critical Review of the Literature* (prepared under a grant from the Office of Human Development, U.S. Department of Health, Education, and Welfare) (Santa Monica, Calif.: Rand, April 1976). At a U.S. Commission on Civil Rights consultation, a representative of the Asian com-

tionnaire and interview findings on minority employment are related to those from the six-city investigations.⁴

Minority Representation Administration on Aging

In 1981 the Administration on Aging had a full-time staff of 113 employees.⁵ A total of 56, or 49.6 percent, of the employees were members of minority groups: 45.1 percent black, 1.8 percent Hispanic, 1.8 percent Asian and Pacific Island American, and 0.9 percent American Indian and Alaskan Native. Whites accounted for 59 positions or 50.4 percent of the Administration on Aging staff⁶ (see table 2.1).

The Commission also obtained data on the occupational distribution of Administration on Aging employees by race and ethnicity. Nearly 75 percent (86) of all persons employed at the Administration on Aging are classified as managers and administrators or professionals.⁷ The top managerial and administrative positions of the Administration on Aging are in the Office of the Commissioner. The agency is headed by a Commissioner, a black, who develops and directs the programs of the Administration on Aging and is assisted by a Deputy Commission-

er, a white.⁸ In addition to the Office of the Commissioner, the Administration on Aging has six divisions,⁹ each with a division manager and one or more assistant division managers. Five of the six division managers are white. The one minority division manager is black and heads the Office of Education and Training. Of the 12 assistant division managers, 10 are white. One Asian and Pacific Island American and one black are assistant division managers for the Division of Research and Evaluation and for the Public Inquiries Staff of the National Clearinghouse on Aging, respectively.¹⁰

As shown in table 2.1, 65 employees of the Administration on Aging are classified as professionals. Whites hold 39, or 60.0 percent, and minorities hold 26, or 38.8 percent, of the professional positions at the Administration on Aging. Of these 26 professional positions, blacks hold 22, Hispanics 2, and Asian and Pacific Island Americans and American Indians each hold one.¹¹ Almost all of the persons employed by the Administration on Aging in paraprofessional¹² or clerical positions are black¹³ (see table 2.1).

Minority personnel are concentrated in lower salaried positions. Table 2.2 sets out the distribution across salary ranges

⁴ See app. C.

⁵ Carol Brown, Special Assistant to the Commissioner, Office of the Commissioner, and Donald Smith, Director, Office of Management and Policy Control, Administration on Aging, interview in Washington, D.C., Feb. 3, 1982 (hereafter cited as Brown and Smith Interview) and Carol Brown, interview in Washington, D.C., Feb. 5, 1982 (hereafter cited as Brown Interview).

⁶ The Administration on Aging is located in Washington, D.C., an area where a substantial percentage of the minority work force is professional.

⁷ See app. A, glossary.

⁸ Brown and Smith Interview.

⁹ The six divisions are: the Office of Management and Policy Control; Office of Program Operations; Office of Research, Development, and Evaluation; Office of Education and Training; National Clearinghouse on Aging; and Office of Public Information.

¹⁰ Brown and Smith Interview.

¹¹ Ibid.

¹² See app. A.

¹³ Persons employed as paraprofessionals and clericals accounted for 20.6 percent of all persons employed at the Administration on Aging. Minorities represented 92.9 percent of all persons holding these positions and whites accounted for 7.1 percent. Brown and Smith Interview.

Table 2.1**Administration on Aging Employees in Washington, D.C., by Position and Race or Ethnicity, January 1981**

Race/ethnicity	Total	Agency director	Managers and administrators	Professionals	Para-professionals	Clericals
American Indians/ Alaskan Natives	# 1* % (0.9)	0 (0.0)	0 (0.0)	1 (1.5)	0 (0.0)	0 (0.0)
Asian and Pacific Island Americans	2 (1.8)	0 (0.0)	1 (5.3)	1 (1.5)	0 (0.0)	0 (0.0)
Blacks	51 (45.1)	1 (100.0)	2 (10.5)	22 (33.8)	6 (100.0)	20 (90.9)
Hispanics	2 (1.8)	0 (0.0)	0 (0.0)	2 (3.1)	0 (0.0)	0 (0.0)
Whites	57 (50.4)	0 (0.0)	16 (84.2)	39 (60.0)	0 (0.0)	2 (9.1)
Total						
Number	113	1	19	65	6	22
Percent	(100.0)	(100.0)	(100.0)	(100.0)	(100.0)	(100.0)

* This figure can be interpreted as follows: in January 1981 one (0.9 percent) American Indian/Alaskan Native was employed by the Administration on Aging.

Source: Carol Brown and Donald Smith, officials of the AoA, interviews in Washington, D.C., Feb. 3, 1982.

Table 2.2

Salary Distribution by Grade Level of Administration on Aging Employees in Washington, D.C., by Race or Ethnicity, January 1981*

Annual salary range ¹	General schedule (GS) level	Total	American Indians/ Alaskan Natives	Asian and Pacific Island Americans	Blacks	Hispanics	Whites
\$44,547-57,912 ²	GS-15	9	0	0	2	0	7
	%	(100.0)	(0.0)	(0.0)	(22.2)	(0.0)	(77.8)
37,871-49,229	GS-14	14	0	1	4	0	9
		(100.0)	(0.0)	(7.1)	(28.6)	(0.0)	(64.3)
32,048-41,660	GS-13	39	1	1	7	1	29
		(100.0)	(2.6)	(2.6)	(17.9)	(2.6)	(74.3)
26,951-35,033	GS-12	11	0	0	5	1	5
		(100.0)	(0.0)	(0.0)	(45.5)	(9.0)	(45.5)
22,486-29,236	GS-11	6	0	0	4	0	2
		(100.0)	(0.0)	(0.0)	(66.7)	(0.0)	(33.3)
20,467-26,605	GS-10	0	0	0	0	0	0
		(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)
18,585-24,165	GS-9	4	0	0	1	1	2
		(100.0)	(0.0)	(0.0)	(25.0)	(25.0)	(50.0)
16,826-21,975	GS-8	1	0	0	1	0	0
		(100.0)	(0.0)	(0.0)	(100.0)	(0.0)	(0.0)
15,193-19,747	GS-7	6	0	0	6	0	0
		(100.0)	(0.0)	(0.0)	(100.0)	(0.0)	(0.0)
13,672-17,776	GS-6	7	0	0	7	0	0
		(100.0)	(0.0)	(0.0)	(100.0)	(0.0)	(0.0)
12,266-15,947	GS-5	7	0	0	7	0	0
		(100.0)	(0.0)	(0.0)	(100.0)	(0.0)	(0.0)
10,963-14,246	GS-4	6	0	0	5	0	1
		(100.0)	(0.0)	(0.0)	(83.3)	(0.0)	(16.7)

* Full-time employees, excluding three persons holding senior executive level positions (positions excluded from GS schedule).

¹ Annual salary ranges shown in the table were effective October 1, 1980. No persons were employed by AoA below the GS (general schedule) 4 level.

² The rate of pay for employees at these rates was limited to \$50,112.50.

Source: Data collected from U.S. Commission on Civil Rights' survey of the Administration on Aging, February 1982.

within each racial and ethnic group employed by the Administration on Aging. More than 96 percent (26) of persons employed in salary ranges GS-4 through GS-8, the lowest salary range, are minority (see table 2.2). In comparison, only one white employee is at this level.

Regional Offices

The 10 Administration on Aging regional offices¹⁴ reported a total of 135¹⁵ employees in 1981. Of nine¹⁶ regional directors, six were white. The remaining three included one black, one Hispanic, and one Asian and Pacific Island American (see table 2.3).

Most (87) of the regional office positions were classified as professional level jobs. Of the total number of professional positions, whites held 65.5 percent (57), blacks 24.1 percent (21), Hispanics 8.1 percent (7), and Asian and Pacific Island Americans 2.3 percent (2). No American Indians or Alaskan Natives were employed by the Administration on Aging regional offices (see table 2.3).

State Units on Aging

Table 2.4 provides information compiled from the Commission's mail survey

¹⁴ The Administration on Aging regional offices are as follows: Region I (Conn., Maine, Mass., N.H., R.I., Vt.), office in Boston, Mass.; Region II (N.J., N.Y., Puerto Rico, Virgin Islands), office in New York, N.Y.; Region III (Del., D.C., Md., Pa., Va., W.Va.), office in Philadelphia, Pa.; Region IV (Ala., Fla., Ga., Ky., Miss., N.C., S.C., Tenn.), office in Atlanta, Ga.; Region V (Ill., Ind., Mich., Minn., Ohio, Wis.), office in Chicago, Ill.; Region VI (Ark., La., N. Mex., Okla., Tex.), office in Dallas, Tex.; Region VII (Iowa, Kans., Mo., Nebr.) office in Kansas City, Mo.; Region VIII (Colo., Mont., N. Dak., S. Dak., Utah, Wyo.), office in Denver, Colo.; Region IX (Ariz., Calif., Hawaii, Nev., Samoa, Guam, Trust Territory), office in San Francisco, Calif.; Region X (Alaska, Idaho, Oreg., Wash.), office in Seattle, Wash.

to all State units on aging and describes the composition of the full-time work force of State units on aging by race, ethnicity, and job classification as of January 1981.¹⁷ The data indicate that those minorities who were employed by State units generally were not employed as agency directors or professionals.

A total of 83.6 percent (1,547) of all employees at the State level were white, while minorities represented 16.4 percent (304) of this work force.¹⁸ Of the 49 agency directors in the survey, 5 were minority—2 black, 1 American Indian/Alaskan Native, 1 Asian and Pacific Island American, and 1 Hispanic.

Similarly, whites constituted more than 85 percent (1,031) of the professional employees in the survey of State units. By contrast, the largest proportion of minorities were employed in three job categories at the State level—paraprofessional, clerical, and "other" (see table 2.4).

Area Agencies on Aging

The Commission's study of six selected communities reported:

¹⁵ U.S., Commission on Civil Rights, Administration on Aging Regional Office Employment survey, Regions I-X, January 1981 (hereafter cited as Regional Survey). See app. C for details on surveys.

¹⁶ One regional director position was vacant at the time of the survey.

¹⁷ In 1981 the Administration on Aging had agencies on aging in each of the 50 States and also in the District of Columbia, Puerto Rico, Guam, Samoa, the Pacific Island Trust Territory, and the Northern Mariana Islands.

¹⁸ U.S., Commission on Civil Rights, State Units on Aging Survey, January 1981 (hereafter cited as State Survey). See app. C for details on surveys, including the nonresponse rate.

Table 2.3**Administration on Aging Employees in Regional Offices by Position and Race or Ethnicity, January 1981**

Race/ethnicity		Total	Directors	Professionals	Paraprofessionals	Clericals
American Indians/ Alaskan Natives	#	0	0	0	0	0
	%	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)
Asian and Pacific Island Americans		8*	1	2	3	2
		(5.9)	(11.1)	(2.3)	(20.0)	(8.3)
Blacks		31	1	21	2	7
		(23.0)	(11.1)	(24.1)	(13.3)	(29.2)
Hispanics		10	1	7	0	2
		(7.4)	(11.1)	(8.1)	(0.0)	(8.3)
Whites		86	6	57	10	13
		(63.7)	(66.7)	(65.5)	(66.7)	(54.2)
Total						
Number		135	9 ¹	87	15	24
Percent		(100.0)	(100.0)	(100.0)	(100.0)	(100.0)

* This figure can be interpreted as follows: in January 1981, 8 (5.9 percent) Asian and Pacific Island Americans were employed in the AOA regional offices.

¹ At the time of the survey one agency director position was vacant.

Source: Data collected from U.S. Commission on Civil Rights' survey of regional offices, Feb. 11, 1982.

Table 2.4**Employees of State Units on Aging by Position and Race or Ethnicity,
January 1981**

	Total	Agency directors	Professionals	Para- professionals	Clericals	Other ¹
American Indians/ Alaskan Natives	# 14* % (0.8)	1 (2.0)	7 (0.6)	1 (1.9)	5 (1.1)	0 (0.0)
Asian and Pacific Island Americans	39 (2.1)	1 (2.0)	28 (2.3)	1 (1.9)	9 (1.9)	0 (0.0)
Blacks	206 (11.1)	2 (4.1)	113 (9.4)	9 (17.0)	61 (13.0)	21 (28.4)
Hispanics	45 (2.4)	1 (2.0)	28 (2.3)	0 (0.0)	14 (3.0)	2 (2.7)
Whites	1,547 (83.6)	44 (89.9)	1,031 (85.4)	42 (79.2)	379 (81.0)	51 (68.9)
Total						
Number	1,851	49	1,207	53	468	74
Percent	(100.0)	(100.0)	(100.0)	(100.0)	(100.0)	(100.0)

¹ Where specified, the "other" category included technical level positions and custodial and maintenance positions.

* This figure can be interpreted as follows: in January 1981, 14 (0.8 percent) persons in the survey employed by the State units on aging were American Indian/Alaskan Natives.

Source: Data collected from U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

Table 2.5

Employees of Area Agencies on Aging by Position and Race or Ethnicity, January 1981

Race/ethnicity	Total	Agency directors	Professionals	Paraprofessionals	Clericals	Other ¹
American Indians/ Alaskan Natives	# 16* % (0.4)	1 (0.5)	8 (0.4)	1 (0.1)	6 (0.7)	0 (0.0)
Asian and Pacific Island Americans	47 (1.1)	0 (0.0)	28 (1.4)	7 (0.9)	11 (1.3)	1 (0.5)
Blacks	697 (17.1)	13 (6.4)	269 (13.1)	221 (28.9)	163 (19.4)	31 (14.1)
Hispanics	99 (2.4)	4 (2.0)	42 (2.0)	17 (2.2)	34 (4.1)	2 (0.9)
Whites	3,228 (79.0)	186 (91.2)	1,712 (83.1)	520 (67.9)	625 (74.5)	185 (84.5)
Total						
Number	4,087	204	2,059	766	839	219
Percent	(100.0)	(100.0)	(100.0)	(100.0)	(100.0)	(100.0)

¹ Where specified, the "other" category included technical level positions and custodial and maintenance positions.

* This figure can be interpreted as follows: in January 1981, 16 (0.4 percent) persons in the survey employed by the area agencies on aging were American Indians/Alaskan Natives.

Source: Data collected from U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

in most communities some minorities were included among Older Americans Act program participants as area agency on aging employees. Blacks, while employed by most area agencies on aging, were generally not represented in policy and supervisory positions on the area agencies on aging's staff. In most cities, where employed, Hispanics were found largely in clerical and paraprofessional jobs. . . . American Indians and Asian and Pacific Island Americans generally were absent from the area agency on aging staff.¹⁹

Table 2.5 shows the distribution by race or ethnicity and by job classification

¹⁹ U.S. Commission on Civil Rights, *Providing Services to the Minority Elderly—New Programs, Old Problems, Executive Summary* (November

of employees for area agencies that responded to the survey. On January 1, 1981, these area agencies employed 4,087 persons. More than half of all minorities employed by area agencies in the survey were concentrated in two job categories: paraprofessional and clerical.

White employees occupied 91.2 percent of all the agency director positions for those area agencies that responded to the survey. By contrast, minorities occupied fewer than 9 percent of the directors' positions. Of the 48 minorities in directors' positions, 43 were black, 4 were Hispanic, and 1 was an American Indian/Alaskan Native.

In the professional category, whites held 83.1 percent or 1,712 of the 2,059

1981), p. 7 (hereafter cited as *Minority Elderly Services, Summary*).

professional level positions while minorities held 16.9 percent or 342 of these positions. Blacks accounted for 269 of the professional positions held by minorities at the area agency level.

The largest concentration of minority employees was in the paraprofessional and clerical job categories. More than half (460) of all minorities employed by area agencies on aging in the survey were in these positions. More than half (384) of all black employees at the area agency level were classified as paraprofessionals or clericals (see table 2.5), as were more than half (51) of Hispanics. Of the 47 Asian and Pacific Island Americans employed at the area agency level, 28 were employed as professionals, 11 as clericals, 7 as paraprofessionals, and 1 Asian and Pacific Island American was employed in the "other" category. Less than 1 percent of the persons employed by the area agencies in the survey were American Indians or Alaskan Natives (see table 2.5).

Bilingual Employees of Area Agencies on Aging

The Commission survey of employment practices of area agencies also examined whether these agencies em-

²⁰ Results of the six-city investigation reported that the absence of Older Americans Act program staff who could provide bilingual services was a major barrier to services for older persons who do not speak English as their principal language.

²¹ "In areas where significant number of clients do not speak English as their principal language, adopt employment policies that ensure that legal assistance will be provided in the language spoken by those clients. . . ." 45 Fed. Reg. 21160 (1980).

²² Brown and Smith Interview.

²³ James Kolb, Director, Division of Program Management, and Robert Stovenour, Director,

employed staff who could communicate in a language other than English.²⁰ Despite Federal regulations,²¹ according to Administration on Aging representatives, the Administration on Aging has no specific policies or criteria regarding the employment of bilingual staff at the area agencies on aging.²² Nor has the Administration on Aging developed criteria to determine whether there is a special need to employ bilingual staff in State units or area agencies on aging.²³

Data collected from the survey of area agencies on aging indicated that, in general, area agencies on aging have few staff members who speak fluently²⁴ languages other than English. The six-city investigations also indicated that: "Bilingual staff were normally absent from area agencies on aging's employment rosters. In none of the cities was there a requirement for any bilingualism among program staff. . . even where population data would project a need."²⁵

Affirmative Action

Affirmative action implies a commitment to remedy discrimination that limits employment opportunities of minorities.²⁶ As a remedy for denials of equal opportunity, the Administration on Ag-

Division of Program Analysis, Office of State and Community Programs, interview in Washington, D.C., Feb. 2, 1982 (hereafter cited as Kolb and Stovenour Interview).

²⁴ See app. A.

²⁵ *Minority Elderly Services, Summary*. Area agencies on aging are responsible for providing comprehensive and coordinated social and nutrition services to older persons.

²⁶ *Affirmative Action in the 1980s* argues that "affirmative action means active efforts that take race, sex, and national origin into account for the purpose of remedying discrimination." U.S., Commission on Civil Rights, *Affirmative*

ing has authority to require development of affirmative action plans by State units on aging.²⁷

Administration on Aging

According to Administration on Aging representatives, no staff persons are assigned full time to carry out affirmative action responsibilities at the Federal level nor does the Administration on Aging have a formal office of minority affairs.²⁸ One Administration on Aging staff person, assigned to the Commissioner on Aging, has responsibility for affirmative action activities on a part-time basis. According to Administration on Aging officials, the affirmative action duties and responsibilities at the Administration on Aging require not only the development of internal affirmative action plans and programs, but also their implementation. Other affirmative action duties of the staff person devoting part time to civil rights concerns include assisting in the resolution of civil rights-related complaints, participating in the negotiation of contract agreements, conducting educational programs and providing information on Administration on Aging civil rights policies, and participating in community activities.²⁹ In short, one staff person is responsible for helping to ensure that minority interests are protected in all Administration on Aging policy decisions.

Action in the 1980s: Dismantling the Process of Discrimination (November 1981), p. 3.

²⁷ Brown and Smith Interview, p. 2. See also 45 C.F.R. §1321.17 (1980).

²⁸ Brown and Smith Interview.

²⁹ Ibid.

³⁰ Ibid. See also 45 C.F.R. §1321.3 (1980).

³¹ The Administration on Aging is part of the Office of Human Development of the U.S. Department of Health and Human Services. As

As the umbrella agency established under the Older Americans Act, the Administration on Aging is required to provide leadership to State units and area agencies on aging as they develop, implement, and evaluate their affirmative action programs.³⁰ According to Administration on Aging officials, the agency does not provide specific affirmative action guidelines to its regional offices, State units on aging, or area agencies on aging.³¹ Nor does the Administration on Aging require that each of these offices submit individual affirmative action plans. Administration on Aging officials stated that agencies established by the Older Americans Act are covered by affirmative action policies and guidelines developed by the U.S. Department of Health and Human Services.³² Although the Administration on Aging's affirmative action plan emphasizes that goal setting is one way to assure that affirmative action is a priority in the agency, an Administration on Aging representative noted that specific employment goals in the agency's affirmative action plan had not been realized. In particular, hiring goals set by the Administration on Aging to increase the employment of Hispanics and Asian and Pacific Island Americans in the Washington, D.C., headquarters office remained unmet.³³

such, the Administration on Aging and other agencies established by the Older Americans Act are covered under departmentwide affirmative action plans. Kolb and Stovenour Interview.

³² Title VII of the Civil Rights Act of 1964, which covers all public and private employers with 15 or more employees, expressly prohibits all forms of discrimination in employment.

³³ M. Gene Handelsman, Special Assistant to the Commissioner, Office of the Commissioner,

State Units on Aging

Administration on Aging representatives stated that the agency provides no specific guidelines to State units on aging regarding affirmative action in employment.³⁴ Instead, according to the same officials, all agencies authorized under the Older Americans Act are covered by Department of Health and Human Services departmentwide affirmative action plans, which require the agencies to develop and maintain affirmative action plans for equal employment opportunity.³⁵ These representatives stated, however, that the Administration on Aging conducts a yearly assessment entitled "State Agency Capacity To Meet Its Responsibilities In Civil Rights."³⁶ The assessment consists of a checklist of possible affirmative action efforts that may have taken place during the course of the year. One of the primary concerns of this assessment is whether or not the State agency is operating under a current affirmative action plan.³⁷ In particular, the checklist identifies whether the plan contains "measurable goals relative to the employment and upgrading of minorities, women, and persons aged 60 or over."³⁸ The assessment, however, does not require that State units report their specific goals or whether they were successful in meeting them. The assessment collects data on whether the State agencies' affirmative action plans contain "specific action steps and timetables to assure equal

employment opportunity. . ." and whether or not there are "grievance and appeal procedures regarding discrimination in employment. . . ."³⁹ The assessment contains an additional 20 affirmative action employment questions to which each State must respond with a yes or no.

Information obtained by the Commission survey indicated that 48 of the 50 State units on aging responding to the mail survey had an affirmative action plan currently in effect. The number of State units on aging plans that required specific affirmative action efforts such as hiring, promotion, and training goals and timetables⁴⁰ for minorities was far fewer (see table 2.6). Hiring goals and timetables were included in 30 (62.5 percent) of the State plans in the survey. The number of States that required goals and timetables for the promotion of minorities dropped to 22 (45.8 percent), and less than 20 (39.6 percent) of the surveyed State plans specified goals and timetables for minority training.

According to the survey, of those States that reported having affirmative action goals for hiring minorities in fiscal year 1981, almost half (20) reported that they had been unsuccessful in meeting their goals. Similarly, half (14) of the States that required goals for promoting minorities reported that they had not met their goals.

Administration on Aging, interview in Washington, D.C., Feb. 5, 1981, and Brown Interview.

³⁴ Kolb and Stovenour Interview.

³⁵ In addition to the Federal laws and regulations, most State and local governments have laws prohibiting discrimination in employment.

³⁶ Kolb and Stovenour Interview.

³⁷ U.S., Department of Health, Education, and

Welfare, Office of the Secretary, Office of Human Development, Administration on Aging, *State Assessment Guide and Standard Regional Office Report Format* (1976), p. 20.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ See app. A.

Table 2.6**Affirmative Action Requirements of State Units on Aging, 1981**

Requirements	State units on aging affirmative action plans that have requirements		
	Yes	No	Don't Know
Goals for hiring minorities*	# 41 % (85.4)	7** (14.6)	—
Goals and timetables for hiring minorities	30 (62.5)	18 (37.5)	—
Goals for promoting minorities	28 (58.3)	19 (39.6)	1 (2.1)
Goals and timetables for promoting minorities	22 (45.8)	25 (52.1)	1 (2.1)
Goals for training minorities	30 (62.5)	17 (35.4)	1 (2.1)
Goals and timetables for training minorities	19 (39.6)	28 (58.3)	1 (2.1)

*"Minorities" refers to blacks, Hispanics, Asian and Pacific Island Americans, and American Indians/Alaskan Natives.

**This figure can be interpreted as follows: in 1981 of 48 State units on aging that reported having an affirmative action plan, 7 or 14.6 percent reported that their plan did not include goals for hiring minorities.

Source: Data collected from U.S. Commission on Civil Rights' survey of State units on aging, January 1981.

Table 2.7**Affirmative Action Requirements of Area Agencies on Aging, 1981**

Requirements	Area agencies on aging affirmative action plans that have requirements		
	Yes	No	Don't Know
Goals for hiring minorities*	# 149 % (75.3)	42** (21.2)	7 (3.5)
Goals and timetables for hiring minorities	82 (41.4)	103 ¹ (52.0)	12 (6.1)
Goals for promoting minorities	103 (52.0)	83 ¹ (41.9)	11 (5.6)
Goals and timetables for promoting minorities	51 (25.8)	131 ¹ (66.2)	14 ² (7.1)
Goals for training minorities	91 (46.0)	95 ¹ (48.0)	11 (5.6)
Goals and timetables for training minorities	48 (24.2)	137 ¹ (69.2)	12 (6.1)

* "Minorities" refers to blacks, Hispanics, Asian and Pacific Island Americans, and American Indians/Alaskan Natives.

** This figure can be interpreted as follows: in 1981 of 198 area agencies on aging that reported having an affirmative action plan, 42 or 21.2 percent reported that their plan did not include goals for hiring minorities.

¹ One area agency on aging reported that the requirement was not applicable.

² One area agency on aging did not respond to this requirement.

Source: Data collected from U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

Results of the Commission survey also identified problems that State units on aging encountered in recruiting minority staff. Budget restrictions on active recruitment was the most serious problem identified by State units on aging in recruiting minority staff. State units also indicated that restrictive personnel regulations⁴¹ and lack of trained minority personnel limited minority recruitment efforts. Similarly, State units identified low staff turnover as an additional problem in the recruitment of minority personnel.

Area Agencies on Aging

Each of the State units on aging that responded to the Commission survey reported that it required area agencies on aging to have an affirmative action plan.⁴² Results of the Commission mail survey to area agencies revealed that of the 206 area agencies on aging in the survey, 7 reported that they did not have an affirmative action plan and 1 area agency on aging reported that it did not know if it had an affirmative action plan.⁴³

The affirmative action plans of area agencies on aging were also less likely to require goals and timetables for hiring, promotion, or training of minorities than the State units on aging plans (see table 2.7). More than half of the area agencies

in the survey having affirmative action plans indicated that their plans did not require goals or timetables for hiring minorities. In addition, most affirmative action plans of the area agencies on aging did not include specific language requiring goals or timetables for promoting minorities. Similarly, the majority of area agency plans surveyed had no goals or timetables for training minorities (see table 2.7).

For 149 area agencies on aging that reported having affirmative action goals for hiring minorities, 62 percent (93) indicated that they had met their goals and 20.8 percent (31) reported that they had not.⁴⁴ More than half (52) of the 103 area agencies which reported that they had affirmative action goals for promoting minorities indicated that they were successful in meeting their goals, while 23 area agencies reported that they had not met their goals for promoting minorities.⁴⁵ The Commission's six-city investigations indicated that: "in almost no instance where goals were unmet by area agencies on aging had substantive corrective actions been taken by the State units on aging or the Administration on Aging" and that "Almost none of the area agencies on aging had a formal recruitment procedure for increasing minority representation among staff, de-

agencies reported "don't know" to the survey question of whether the area agency was successful in meeting its affirmative action goals for hiring target groups.

⁴⁵ Nineteen of the 103 area agencies responded "not applicable" and 9 area agencies on aging responded "don't know" to the survey question of whether the area agency was successful in meeting its affirmative action goals for promoting target groups.

⁴¹ In the survey, restrictive personnel regulations included standardized educational criteria, tests, and residence or citizenship requirements for employment.

⁴² State Survey.

⁴³ U.S., Commission on Civil Rights, Area Agencies on Aging Survey, January 1981. See app. C for details on surveys.

⁴⁴ Eighteen of the 149 area agencies that responded that they had goals for hiring minorities reported "not applicable" and another 7 area

spite certain minority groups' underrepresentation among program staff."⁴⁶

In addition, State units on aging do not generally require area agencies on aging to include staffing plans by race and ethnic background in area plans submitted to the State unit. In fact, only 27 States reported that they require area agencies to supply this information.

Although area agencies have affirmative action plans, most of the plans do not incorporate specific and measurable affirmative action targets for the hiring, promotion, and training of minorities, nor was action taken when deficiencies were noted either in establishing goals or meeting them.

Discrimination Complaints and Enforcement Policy

According to Administration on Aging representatives, the agency does not maintain formal jurisdiction or possess regulatory authority over employment discrimination complaints filed at the regional, State, or area agency level.⁴⁷ Each regional office, State unit, and area agency is authorized to investigate employment discrimination complaints or violations brought to its attention and is empowered to develop procedures for resolving the complaints. Administration on Aging officials also stated that there have been almost no complaints alleging employment discrimination at the Federal, regional, State, or local levels and that there has never been a finding of employment discrimination at

any level of the Administration on Aging.⁴⁸

Summary

Employment data obtained from the mail surveys of Administration on Aging regional offices, State units on aging, and area agencies on aging and interviews with Administration on Aging officials revealed that minorities were not being fully utilized at all employment levels by the agencies established under the Older Americans Act, particularly, as contrasted with whites, in decisionmaking jobs. This has a potential effect on other areas such as contract awards, discussed in chapter 3.

Employment data collected from the Administration on Aging and its regional offices also showed that minorities were represented disproportionately in lower salaried jobs. This was also found at the area agency level by the Commission's case study analyses of six selected cities.

There is no office of minority affairs at the Administration on Aging, and one staff person is responsible part time for carrying out civil rights responsibilities at the Federal level, suggesting that affirmative action is a low priority. Although the Older Americans Act gives the Administration on Aging authority to assist agencies on aging with their affirmative action efforts, the Administration on Aging does not offer specific guidance to its regional offices, State units, or area agencies on accomplishing affirmative action objectives.

tion on Aging and its aging agencies are covered under departmentwide guidelines for discrimination complaints and enforcement.

⁴⁸ Brown Interview, and Kolb and Stovenour Interview.

⁴⁶ *Minority Elderly Services*, p. 149.

⁴⁷ Kolb and Stovenour Interview. The Administration on Aging is part of the Office of Human Development of the U.S. Department of Health and Human Services. As such, the Administra-

At the State level, the Commission survey indicated that almost all States reported that they had affirmative action plans, but fewer reported that the plans generally required specific affirmative action efforts such as hiring, promotion, and training goals and timetables for minorities. Of those State units on aging that reported having affirmative action plans that required goals for hiring and/or goals for promoting minorities, almost half reported that they had been unsuccessful in meeting their goals.

The affirmative action plans of the area agencies on aging were less likely to require goals and timetables for the hiring, promotion, or training of minorities than the State units' plans. In addition,

there were area agencies in the survey that reported that they had no affirmative action plan in effect although the State units on aging indicated that they require all area agencies to have a plan.

The Administration on Aging provides no specific guidance to agencies on aging for dealing with complaints alleging employment discrimination. Administration on Aging officials reported that there have been almost no complaints alleging employment discrimination at the Federal, regional, State, or local levels and that there has never been a finding of employment discrimination at any level of the Administration on Aging.

Chapter 3

Award of Grants and Contracts to Minority Organizations Under Titles III and IV of the Older Americans Act

The Older Americans Act's purpose was to finance the development of new or improved programs to assist older persons by: (1) establishing the Administration on Aging; (2) providing formula grants to State units on aging and area agencies on aging for community planning and services (Title III); and (3) providing project grants for public and private nonprofit agencies for research, development, and training (Title IV).¹ Specifically, the Administration on Aging provides Older Americans Act Title III funds to State units on aging and to area agencies on aging to help them develop a comprehensive and coordinated system of services to older persons.² The designated State units on aging and area agencies, in turn, make further grants and contracts to public or private agencies for community planning, services, and training.

The Administration on Aging also provides funds directly to public and nonprofit private agencies for research that will demonstrate and evaluate programs

or techniques to improve the quality of life of older persons. These funds are authorized under Title IV of the Older Americans Act. In particular, Title IV monies support training, research and development, demonstration projects and programs, and multidisciplinary centers of gerontology.³ To determine how funds under Titles III and IV are disbursed, this chapter provides information on the numbers, amounts, and types of grants and contracts awarded by the Administration on Aging, the State units on aging, and the area agencies on aging. The analyses focus on the relative number and dollar amounts awarded to minority organizations. In addition, this chapter discusses outreach efforts to increase minority participation in grants and contracts and the monitoring of grantees and contractors for nondiscrimination compliance.

Minority Representation Title IV

Under Title IV of the act, funding is made available by the Administration on

¹ Pub. L. No. 89-73, 79 Stat. 218, 220-225.

² 42 U.S.C. §3021 (Supp. III 1979).

³ 42 U.S.C. §§3031, 3035, 3035b, and 3036 (Supp. III 1979).

Table 3.1**Title IV Awards by the Administration on Aging by Race or Ethnicity, Fiscal Year 1980**

Race or ethnicity	Amount	Percent
American Indians/Alaskan Natives	\$ 569,245	1.2%*
Asian and Pacific Island Americans	348,508	0.7
Blacks	1,913,825	4.0
Hispanics	887,742	1.9
Whites	43,910,283	91.9
Total	47,773,203	100.0

* This figure can be interpreted as follows: in 1980, \$569,245, representing 1.2 percent of Title IV funds under the Older Americans Act, were awarded to American Indian/Alaskan Native organizations.

¹ Numbers will not add to 100.0 percent because \$143,600 of the funds were designated to minorities whose race or ethnicity was not identified.

Sources: Howard White, Donald Smith, Sean Sweeney, Marvin Taves, Saadia Greenberg, Harry Posman, K.A. Jaganathan, James Burr, and Carolyn Del Gudice, officials of the Administration on Aging, interviews in Washington, D.C., Feb. 1-12, 1982.

Aging through a grant or contract award process.⁴ In 1980 the Administration on Aging awarded \$47.7 million in Title IV funds to organizations. Minority organizations received approximately \$3.9 million of the \$47.7 million awarded, or 8.1 percent of the available funds (see table 3.1).

⁴ 42 U.S.C. §3037 (Supp. III 1979).

⁵ 42 U.S.C. §3031 (Supp. III 1979). The objective of this title is to "support activities that attract qualified persons to the field of aging, and train persons employed or preparing for employment in aging and related fields." *1980 Catalog of Federal Domestic Assistance*, p. 349.

⁶ 42 U.S.C. §3035 (Supp. III 1979). The objective of this title is to "develop knowledge of the needs and conditions of older persons and of policies, programs and services for improving their lives." *1980 Catalog of Federal Domestic Assistance*, p. 348.

⁷ 42 U.S.C. §3035b (Supp. III 1979). The objective

Title IV funds are divided among four main areas: Title IV-A is for training,⁵ Title IV-B is for research and development,⁶ Title IV-C is for demonstration projects and programs,⁷ Title IV-D is for mortgage insurance and interest grants for multipurpose senior centers,⁸ and Title IV-E is for multidisciplinary centers of gerontology.⁹ In all of these Title

of this program is to "demonstrate new approaches, techniques and methods to improve or expand social services or nutrition services or otherwise promote the well being of older individuals." *1980 Catalog of Federal Domestic Assistance*, p. 346.

⁸ 42 U.S.C. §§3035g, 3035h (Supp. III 1979). Title IV-D has never been funded. Howard White and Marvin Taves, representatives of the Administration on Aging, interviews in Washington, D.C., Feb. 1 and 3, 1982.

⁹ 42 U.S.C. §3036 (Supp. III 1979). The objective of Title IV-E is to support centers of gerontology.

IV areas, minorities received a small percentage of the funds. Minorities re-

ceived 10.5 percent of Title IV-A funds,¹⁰ 2.8 percent of the IV-B,¹¹ 9.0 percent of

1980 Catalog of Federal Domestic Assistance, p. 350.

¹⁰ Eleven programs totaling \$17.0 million existed under Title IV-A in 1980:

1. The "Gerontology Career Preparation Program" provides monies to colleges and universities. A total of \$7,780,000 was funded under this program in 1980. Twelve black colleges and universities received \$1,060,177: University of Arkansas, Pine Bluff, \$78,389; University of D.C., \$138,666; Southern University of New Orleans, \$127,770; Fisk University, \$131,254; Prairie View A&M, \$88,868; Norfolk State University, \$109,205; Lemoyne-Owen College, \$73,257; Virginia Union University, \$88,833; Tougaloo College, \$74,468; Clark College, \$37,706; Paul Quinn College, \$44,576; and Tennessee State University, \$67,185. The rest of the funds (\$6,647,985) went to white colleges and universities. White colleges and universities with sizable minority enrollments received \$1,119,597. Three universities with a sizable Hispanic student enrollment received funds: University of Texas, Arlington, \$141,880; University of New Mexico, School of Law, \$131,533; and St. Thomas Aquinas College, \$77,614. One university with a sizable Asian and Pacific Island student enrollment received funds: University of Hawaii, \$170,000. Three universities and/or colleges with a large black enrollment received funds: M. Evers College of CUNY, \$75,829; Southside Community College, \$32,085; and Wayne State University, \$168,476. Finally, three predominantly white universities with sizable minority student enrollments received funds under this program: San Diego State University, \$141,814; Rockland Community College, \$81,425; and Metropolitan Community College, \$98,941.

2. The "Quality Improvement Program" allocated \$3,000 in 1980. All of the funds went to white organizations.

3. The "Dissertation Research Program" was funded at \$165,000 in 1980. Minority researchers received none of the funds.

4. The "Geriatric Fellowship Program" received more than \$300,000 in Title IV-A funds in 1980. None of this money went to minorities.

5. The "Minority Research Associates Program" was funded at nearly \$300,000 in 1980. Minority researchers at five white universities

received this funding: blacks at Syracuse University, \$74,775; Hispanics at Northern Texas State University, \$54,738; Asian and Pacific Island Americans at SUNY, Buffalo, \$23,816; minorities at San Diego State University, \$74,984; and Miami University of Ohio received \$68,616.

6. The "State Education and Training Program," a formula program to 57 States and territories, in 1980 was funded at \$1,929,000. The minimum amount any one State received was \$30,000.

7. The "National Continuing Educational and Training Program" received \$2,387,000. No minorities received any funding.

8. The "Advocacy Assistance Centers Program" received \$989,000 in 1980. This program was terminated in 1980. No minorities received any funding.

9. The "National Conference Program" received \$578,000 in 1980. Minorities received \$160,000. The National Indian Council on Aging, National Center on Black Aged, Asociacion Nacional Pro Personas Mayores, and Special Services for Group, Inc. (National Pacific Asian Elderly Resource Center) each received \$40,000 in 1980.

10. The "White House Conference Program" was allocated \$2,040,000 in 1980 for preparation of the 1981 White House Conference on Aging.

11. The "Minority Recruitment Program" received \$199,838 in 1980. This funding was received by the National Center on Black Aged, a minority organization. Alfred Byrd, aging training program specialist, Division of Education and Career Preparation, Office of Education and Training, and Sean Sweeney, program officer, Division of Education and Career Preparation, Office of Education and Training, interview in Washington, D.C., Mar. 3, 1982 (hereafter cited as Sweeney Interview).

¹¹ Two minority organizations received funding under Title IV-B. Asociacion Nacional Pro Personas Mayores received \$191,952 for a project entitled "Hispanic Support Systems and the Chronically Ill Older Hispanic," and the National Center on Black Aged received \$34,320 for a project entitled "Employment Opportunities for Middle-Aged Older White and Non-white Women: A State of the Art." K.A. Jaganathan, Acting Director, Division of Research and Evaluation,

the IV-C,¹² and 4.7 percent of the IV-E funds¹³ (see table 3.2). Table 3.2 illustrates the percentages of funds received by specific minority groups under each of the Title IV programs. For example, under Title IV-B, research and development programs, American Indian and Asian American organizations received none of the funds; black organizations, 0.4 percent; Hispanic organizations, 2.4 percent; and white organizations, 97.2 percent of the available funds.

One of the programs under Title IV-C is the national impact program, which has as one of its main objectives the

funding of the national minority age organizations, such as the National Center on Black Aged.¹⁴ Funding under this program is for:

innovation and development projects and activities of national significance which show promise of having substantial impact on the expansion or improvement of social services, nutrition services, or multipurpose senior centers or otherwise promoting the well-being of older individuals; and dissemination of information activities related to such programs.¹⁵

Office of Research, Demonstration, and Evaluation, interview in Washington, D.C., Feb. 11, 1982 (hereafter cited as Jaganathan Interview), and Howard White, Special Assistant to the Associate Commissioner, Office of Research, Demonstration, and Evaluation, interview in Washington, D.C., Feb. 1, 1982 (hereafter cited as White Interview).

¹² Four programs received funding under Title IV-C:

1. Demonstration projects and programs were allocated \$1,924,205. Three Hispanic and one American Indian organization received \$306,617 in funds.

The Mexican-American Community Agency received \$107,000 for a project on "The Hispanic Service Advocate Program"; Amigos Del Valle received \$85,000 for "Amigos Del Valle Information and Referral Model Project to Increase Hispanic Access to Service"; Little Havana Activity Center received \$60,000 for "Hispanic Opportunities Program"; and the Inter-Tribal Council of Arizona received \$54,617 for "Alternative Models for the Operation of Comprehensive, Coordinated Systems of Service to the Elderly on Indian Reservations." Marvin Taves, Director, Division of Model Projects and Demonstrations, Office of Research, Demonstration, and Evaluation, interview in Washington, D.C., Feb. 3, 1982 (hereafter cited as Taves Interview).

2. Long-term care demonstration projects were allocated \$12,248,516 of which \$138,230 went to two American Indian organizations. The Cherokee Nation Health Department received \$53,924

for the "Cherokee Nation Geriatric Health Program" and the Yakima Indian Nation received \$84,306 for the "Implementation of In-Home Health Care and Coordination of Existing Services for Yakima Elderly." Taves Interview.

3. Legal services was allocated \$2,921,841 in 1980. No minority organizations received funds under this program. Carolyn Del Gudice, aging program specialist, Office of Program Development, interview in Washington, D.C., Feb. 12, 1982 (hereafter cited as Del Gudice Interview).

4. The national impact program was allocated \$2,413,641 in 1980. Each of the national minority age organizations received funds. The National Indian Council on Aging received \$336,398 for the project "National Advocacy to Assist Access of Older American Indians to Services and Entitlements—the Older Americans Act and Other Public Programs." The National Center on Black Aged received \$349,857 for its "National Aging Organization Projects Program." Special Service for Groups, Inc., received \$284,692 for its "Pacific/Asian Elderly Coalition." Finally, the Asocacion Nacional Pro Personas Mayores received \$349,052 for its "Mano A Mano." Taves Interview.

¹³ One minority organization received funding. Meharry Medical College received \$154,858 for its "Long Term Care Gerontology Center Planning Project." Harry Posman, Director, Division of Long-Term Care, Office of Research, Demonstration, and Evaluation, interview in Washington, D.C., Feb. 11, 1982.

¹⁴ Taves Interview.

Minority organizations received more than \$1.3 million under this program or one-third of all monies received by minorities under Title IV.

The data collected from Administration on Aging representatives indicate that all minority organizations receive relatively little of the available Title IV funds, and what little is available to minority organizations is received by black organizations. As shown in table 3.2, if it were not for the funds received by the national minority age organizations under Title IV-C, American Indian/Alaskan Native, Asian and Pacific Island American, and Hispanic organizations would receive almost none of the \$47.7 million in available funds under Title IV of the Older Americans Act.

Title III

The Commission survey also obtained information on the relative number and dollar amounts awarded to minority organizations in 1980 under Title III of the Older Americans Act. Title III provides for formula grants¹⁶ to State agencies on aging.¹⁷ Grants under Title III are made to States to provide nutrition services (both congregate (group) and home-delivered meals), multipurpose senior centers, and a comprehensive array of social services (e.g., transportation, information and referral, and day care) to older persons through the area agencies on aging.¹⁸ Each State agency is responsi-

ble for disbursing funds to its respective area agencies on aging,¹⁹ so that they can actually deliver Title III services to older persons.²⁰ The area agencies on aging, in turn, enter into grant and contract agreements with service providers who are responsible for implementing the programs for the elderly specified by the Older Americans Act.²¹

In the Commission's survey of Older Americans Act programs in six selected communities, minority organizations received small numbers and amounts of Title III funds from almost all area agencies on aging surveyed, "in spite of the fact that such firms often were in the position to render unique services and had displayed the ability to provide effectively services for achieving Title III objectives."²²

Information collected from the Commission's mail survey to all area agencies on aging indicates that this pattern holds true nationally (see table 3.3). For example, black organizations in 1980 received 6.9 percent of the funds awarded under Title III. By contrast, whites received 90.6 percent of the available Title III funds in 1980. Other racial and ethnic groups received smaller amounts of the Title III funds: American Indian organizations received 0.3 percent; Asian American organizations, 0.5 percent; and Hispanic organizations, 1.6 percent of the dollars awarded.

¹⁵ U.S., Department of Health and Human Services, Office of Human Development Services, Administration on Aging, *Guidelines for Preparation of Grant Applications: Model Projects and Demonstrations Program Title IV-C of the Older Americans Act Fiscal Year 1981* (no date), p. 72.

¹⁶ The funding formula for the grants is based upon a State's population age 60 years and older. 42 U.S.C. §3024(a) (Supp. III 1979).

¹⁷ See app. A.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ 42 U.S.C. §3025 (Supp. III 1979).

²¹ 42 U.S.C. §3026 (Supp. III 1979).

²² U.S., Commission on Civil Rights, *Providing Services to the Minority Elderly—New Programs, Old Problems, Executive Summary* (November, 1981) (hereafter cited as *Minority Elderly Services, Summary*), p. 8.

Table 3.2**Title IV Awards by Area Agencies on Aging by Program and Race or Ethnicity, Fiscal Year 1980**

Race or ethnicity	A	Title IV programs		E ¹
		B	C	
American Indians/Alaskan Natives	0.2%	0.0%	2.7%*	0.0%
Asian and Pacific Island Americans	0.4	0.0	1.5	0.0
Blacks	8.1	0.4	1.8	4.7
Hispanics	0.6	2.4	3.1	0.0
Whites	89.9	97.2	91.0	95.3
Percent	100.0 ²	100.0	100.0	100.0
Dollar Amount	\$17,000,000	\$8,000,000	\$19,508,203	\$3,265,000

* This figure can be interpreted as follows: in 1980, 2.7 percent of Title IV-C funds went to American Indian/Alaskan Native organizations.

¹ Title IV-D, mortgage insurance and interest grants for multipurpose senior centers, has never been funded.

² Numbers will not add to 100.0 percent because \$143,600 of the funds were designated to minorities whose race or ethnicity was not identified.

Sources: Howard White, Donald Smith, Sean Sweeney, Marvin Taves, Saadia Greenberg, Harry Posman, K.A. Jaganathan, James Burr, and Carolyn Del Gudice, officials of the Administration on Aging, interviews in Washington, D.C., Feb. 1-12, 1982.

Table 3.3**Title III Awards by Area Agencies on Aging by Race or Ethnicity, Fiscal Year 1980**

Race or ethnicity	Awards		Amounts	
	No.	%		
American Indians/ Alaskan Natives	33	0.7	\$ 880,175	0.3%*
Asian and Pacific Island Americans	31	0.6	1,422,169	0.5
Blacks	420	8.6	20,448,603	6.9
Hispanics	73	1.5	1,848,523	1.6
Whites	4,354	88.7	266,725,970	90.6
Total	4,911	100.0	\$294,325,440	100.0

* This figure can be interpreted as follows: in 1980, American Indians/Alaskan Natives received \$880,175 or 0.3 percent of the Title III funds made available by the area agencies on aging that responded to the survey.

Source: Data collected by the U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

Outreach and Selection Procedures

Title IV

The Commission also obtained information from the Administration on Aging regarding its outreach and selection procedures. According to Administration on Aging representatives, the agency provides publicity in English on the availability of funds under Title IV of the Older Americans Act.²³ Organizations that submit proposals for Title IV funds must comply with the general Administration on Aging "Guidelines for Preparation of Grant Applications."²⁴ These guidelines explain the topics to be covered and procedures to be followed when applying for Title IV funds. Each application is reviewed with respect to its program and policy relevance, technical approach, project implementation plan, staffing and management, and budget appropriateness and reasonableness.²⁵

The Commissioner has the final decision on awarding Title IV grants; however, the Commissioner's decision takes into consideration recommendations from a panel of reviewers who are not employees of the Administration on Aging, comments from State units on aging, and those of the Administration on Aging staff. Specialists and consultants

inside and outside government may also be asked to comment.²⁶ Prior to 1980 the guidelines included language that encouraged minority organizations to apply for available funds.²⁷ For example, in 1979 the grant application guidelines for a program funded under Title IV-B contained language that gave priority to potential minority grantees and contractors, since it was established:

[t]o provide an opportunity to gain research experience for professionals who are not well-established, including those who: (1) recently have been awarded the doctorate, (2) are members of minority groups, or (3) are affiliated with organizations and agencies which do not provide support for large-scale research activities. . . .²⁸

Because of legislative changes in the Older Americans Act, language that specifically made reference to minority applicants was removed from the guidelines in 1980.²⁹ It is too soon to analyze what effect the changes in the guidelines will have on future funding for minority grantees and contractors, but participation currently is at a low level.

²³ Sweeney Interview, Taves Interview, Jagannathan Interview, Posman Interview, and Saadia Greenberg, Director, Division of Continuing Education, Office of Education and Training, interview in Washington, D.C., Feb. 10, 1982 (hereafter cited as Greenberg Interview).

²⁴ Ibid., and Carol Brown, Special Assistant to the Commissioner, Office of the Commissioner, interview in Washington, D.C., Feb. 3, 1982 (hereafter cited as Brown Interview).

²⁵ U.S., Department of Health, Education, and Welfare, Office of Human Development Services, Administration on Aging, *Guidelines for Preparation of Grant Applications Research and Develop-*

ment Projects in Aging Title IV-B of the Older Americans Act Fiscal Year 1979(no date), pp. 106-13 (hereafter cited as *Guidelines*). In 1980 the U.S. Department of Health, Education, and Welfare was divided into two separate departments: U.S. Department of Health and Human Services and U.S. Department of Education. The Administration on Aging is under the U.S. Department of Health and Human Services.

²⁶ Ibid., p. 112.

²⁷ Brown Interview.

²⁸ *Guidelines*, p. 97.

²⁹ Brown Interview.

Title III

Despite the low representation of minority organizations as Title III recipients, agency officials stated that the Administration on Aging has not formally or informally encouraged its agencies to contract with minority organizations to increase their participation in Older Americans Act programs. According to these officials, State units on aging and area agencies on aging are the agencies that provide outreach and technical assistance to potential Title III-funded organizations.³⁰ However, one of the findings reported in the Commission's study of six selected communities was that area agencies on aging had few formal mechanisms in place to provide technical assistance to potential minority grantees and contractors:

In most cities visited, representatives of minority organizations stated that the failure to provide standardized technical assistance by the area agencies on aging was one reason for the lack of minority contractors. They also voiced concern that the lack of technical assistance actually was a reflection of the area agencies on aging's unwillingness to try actively to serve or increase minority participation in service programs.³¹

³⁰ James Kolb, Director, Division of Program Management, and Robert Stovenour, Director, Division of Operations Analysis, Office of State and Community Programs, interview in Washington, D.C., Feb. 4, 1982 (hereafter cited as Kolb and Stovenour Interview).

Monitoring and Compliance Activities

The extent to which those agencies that award funds monitor and evaluate recipients regarding civil rights issues may indicate whether minorities will be assured of receiving full benefits under the Older Americans Act.

Title IV

According to Administration on Aging officials, the agency does not have a specific mechanism for civil rights monitoring of Title IV projects because compliance with civil rights statutes is dealt with at the point of the award.³² All potential grantees and contractors of any Health and Human Services funding must sign assurances before their applications can be processed. In the assurances, applicants must agree to comply with Title VI of the Civil Rights Act of 1964.³³

Once the assurances have been signed and submitted with an application, the Administration on Aging assumes that the grant or contract recipient will comply with the provisions of Title VI of the Civil Rights Act of 1964. Therefore, according to Administration on Aging officials, the agency does not monitor its Title IV-funded organizations for compliance with Title VI. However, according to these officials, once a grant or contract is awarded, a project monitor is assigned to assess periodically the progress of the project. The monitoring consists primarily of semiannual and annual progress

³¹ *Minority Elderly Services, Summary*, pp. 8-9.

³² Brown Interview, Sweeney Interview, Greenberg Interview, Taves Interview, White Interview, Posman Interview, and Jaganathan Interview.

³³ *Ibid.*

reports, as well as fiscal audits unrelated to Title VI of the Civil Rights Act of 1964.³⁴

Administration on Aging officials stated that no service provider has had financial assistance terminated for failure to comply with Title VI. Since the Administration on Aging does not monitor for civil rights compliance, termination of funds for noncompliance with Title VI of the Civil Rights Act of 1964 is not really a possibility.

Title III

Administration on Aging officials stated that neither Federal nor regional offices conduct compliance reviews of Title III awards; in fact, the Administration on Aging keeps no records on the awards made under Title III of the Older Americans Act.³⁵ Administration on Aging officials stated that once the funds from the Older Americans Act are released to the States, the Administration on Aging's involvement ceases and Title III monitoring becomes the responsibility of the State units on aging.³⁶ Information obtained from the Commission's earlier investigation of six communities indicated, however, that "area agencies on aging were not being monitored closely by the State units on aging or the Administration on Aging regarding civil rights compliance."³⁷

Results from the Commission's mail survey of State units on aging indicate that while 47 of 50 State units on aging report that they keep records or have

information available on the number and amount of Title III grants and contracts awarded by area agencies on aging, less than half (21 of 50) reported that they require their area agencies on aging to submit information on awards given to minority organizations and only 5 of 50 State units on aging required their area agencies to submit reasons for rejection of minority applications for Title III awards.³⁸

Results from the six-city investigation also demonstrated that, once Title III awards were made, area agencies on aging did not monitor service providers for compliance with civil rights statutes. Monitoring of service providers by area agencies on aging was mainly concerned with budget constraints and fiscal audits and not related to compliance with Title VI of the Civil Rights Act of 1964.³⁹ The results from both sections of the Commission study clearly demonstrate that the agencies funded under the Older Americans Act are not in a position to determine how these programs affect minorities, since there are no formal monitoring mechanisms in place to evaluate program administrators' and service providers' compliance with Title VI of the Civil Rights Act of 1964.

Summary

Data obtained from Administration on Aging officials, State units on aging, and area agencies on aging reveal that minority organizations receive a small percentage of available awards under the

Civil Rights' Survey of State Units on Aging, January 1981.

³⁹ U.S., Commission on Civil Rights, *Minority Elderly Services—New Programs, Old Problems, Part I* (June 1982), p. xx.

³⁴ Ibid.

³⁵ Kolb and Stovenour Interviews in Washington, D.C., Feb. 2, 4, and 10, 1982.

³⁶ Ibid.

³⁷ *Minority Elderly Services, Summary*, p. 12.

³⁸ Data collected by the U.S. Commission on

Older Americans Act, and program administrators have not established mechanisms to facilitate increased minority participation in the future.

Specifically, minority organizations receive relatively few of the Title III and Title IV funds. Although the Administration on Aging has direct control over which organizations are funded under Title IV of the Older Americans Act, minority organizations received only 8.1 percent of the available funds in 1980. Minority organizations do not fare much better as recipients of Title III awards. Minority organizations received 9.3 percent of those awards. The Commission's study of six selected communities also found low representation of minority organizations receiving Title III funds.

According to Administration on Aging representatives, the agency provides publicity in English on the availability of funds under Title IV of the Older Americans Act. Administration on Aging representatives state that outreach efforts for Title III-funded organizations are provided at the local level. However, as reported in the Commission's earlier investigation of six communities, area

agencies on aging have few formal mechanisms in place to provide assistance to potential minority grantees and contractors.

Results from the Commission's surveys of State units on aging reveal that most (94 percent) report they are aware of the number and amount of contracts let. However, less than one-half of the State units on aging report that area agencies on aging are required to submit information on the number of awards made to minority organizations, and only five State units on aging report that they require their area agencies on aging to submit reasons for the rejection of minority applications for Title III awards.

Results from the Commission's mail surveys and interviews with Administration on Aging officials indicate that agencies funded under the Older Americans Act are not in a position to determine how Titles III and IV affect minorities, since no formal monitoring mechanisms are in place to evaluate contractors' and grantees' compliance with Title VI of the Civil Rights Act of 1964. This finding also is supported in the Commission's study of six selected communities.

Chapter 4

Minority Participation in Older Americans Act Service Programs

Monitoring and Evaluation of Minority Participation

An effective social services program includes a monitoring and evaluation¹ component that allows administrators to assess their programs and to determine methods to improve service delivery. Social service programs funded under the Older Americans Act are administered by Federal, State, and local authorities, each responsible for appraising the effectiveness of their own programs' service to minorities and also the programs of subordinate agencies. The Commission's investigation of six cities² indicated that evaluation of effectiveness of service to minorities was not a high priority for most area agencies on aging visited. Although the six area agencies on aging indicated that they did monitor their programs, they did not assess the participation of minority elderly. Program administrators asserted that this

was due partly to an absence of reliable data on minority participation in the Older Americans Act service programs.³

Administration on Aging

The Administration on Aging serves as the focal point for Federal program activity related to older persons. Under the Older Americans Act, the Administration on Aging is responsible for monitoring and evaluating Federal programs at State and local levels.⁴ Monitoring of compliance with Title VI of the Civil Rights Act of 1964 is included among its evaluation activities. The assessment of State units on aging by the Administration on Aging, according to its officials, is done on an informal basis. Administration on Aging officials stated that the agency's monitoring and evaluation of Federal programs at the State and local levels to determine whether effective and efficient services are being provided to minorities⁵ consists of completing a

¹ See app. A for definitions of monitoring and evaluation.

² See U.S., Commission on Civil Rights, *Minority Elderly Services—New Programs, Old Problems, Part I* (June 1982) (hereafter cited as *Minority Elderly Services*).

³ Ibid.

⁴ 42 U.S.C. §3012(a)(6) (Supp. III 1976).

⁵ James Kolb, Director, Division of Program Management, and Robert Stovenour, Director, Division of Program Analysis, Office of State and Community Programs, Administration on Aging, interview in Washington, D.C., Feb. 10, 1982

checklist that is part of a general State and area agency assessment guide. It also includes reviewing program performance reports. According to Administration on Aging officials, in addition, public hearings are held and contacts made with national minority organizations to obtain minority views for development of effective programs for minority older persons. The officials said that Administration on Aging regional staff visit individual State units on aging annually and spotcheck area agencies on aging to monitor and evaluate actual service delivery to minority older persons.⁶

State Units on Aging

A State unit on aging is designated by the Administration on Aging to develop and administer a State's program for older persons. It serves as the focal point on aging in the State.⁷ To help area agencies carry out their functions and to improve services to older persons, State units on aging are required by the Administration on Aging to make quarterly onsite assessment visits to area agencies on aging in the State.⁸ These onsite visits include assessment of area agencies on aging for compliance with Title VI of Civil Rights Act of 1964. This requirement attempts to ensure that the State agency reviews progress made by the area agency in the implementation of nondiscrimination guidelines as stated in the area plan.⁹

The Commission's survey of 50 State units on aging sought to determine the extent to which they were assessing the

(hereafter cited as Kolb and Stovenour Interview).

⁶ Ibid.

⁷ See app. A.

⁸ Kolb and Stovenour Interview.

area agencies' service programs regarding minority participation. When asked what agency had primary responsibility for regular evaluation of services to minority older persons, 41 (82.0 percent) State units on aging replied that the evaluation is done by State units on aging. The remaining State units on aging that responded to the Commission's mail survey reported that evaluation of services to minorities rests with area agencies on aging. Data from the State units' questionnaires indicate that nearly 50 percent (26) of the State units on aging evaluate provision of services to minorities by area agencies at least quarterly (see table 4.1). Thirty-six (72.0 percent) of the State units on aging reported that none of their area agencies on aging had ever been found to be out of compliance with nondiscrimination guidelines. Five State units on aging had found that area agencies on aging had not been serving minorities in accordance with the State units' nondiscrimination guidelines.

Area Agencies on Aging

Area agencies on aging are designated by the State unit on aging to develop and administer a comprehensive and coordinated system of services for older persons in a designated area of the State.¹⁰ Of the 206 area agencies on aging in the survey, 129 (62.6 percent) reported that their staff evaluated service delivery programs to minority older persons at least quarterly¹¹ (see table 4.2).

⁹ See app. A.

¹⁰ See app. A.

¹¹ See app. C, methodology. Questions on minority participation in specific services often were left unanswered. In most cases, the actual provi-

Table 4.1**Frequency of State Units on Aging Monitoring and Evaluation of Services to Minorities by Area Agencies on Aging, 1980**

Frequency	Number	Percent
Once a year	18	36.0*
Every 6 months	4	8.0
Every 3 months	24	48.0
Monthly	2	4.0
Other	1	2.0
Never	1	2.0
Total	50	100.0

*This figure can be interpreted as follows: in 1980, 36.0 percent of State units on aging responding to the Commission's mail survey reported that they monitored and/or evaluated their area agencies on aging once a year.

Source: Data collected by the U.S. Commission on Civil Rights' survey of State units on aging, January 1981.

Table 4.2**Frequency of Area Agency on Aging Monitoring and Evaluation of Services to Minorities, 1980**

Frequency	Number	Percent
Once a year	42	20.4*
Every 6 months	15	7.3
Every 3 months	77	37.4
Monthly	52	25.2
Other	14	6.8
Never	4	1.9
Don't Know	2	1.0
Total	206	100.0

*This figure can be interpreted as follows: in 1980, 20.4 percent of the area agencies on aging responding to the Commission's mail survey reported that they monitored and evaluated their progress once a year regarding whether minorities were being served.

Source: Data collected by the U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

Technical Assistance to Increase Minority Participation

Technical assistance is one mechanism that can be used to help increase minority participation in services. Results from the case analyses indicated that few formal mechanisms were in place at the State or local level that would help to increase minority participation.¹² In most cities visited, representatives of minority organizations voiced concern that the lack of technical assistance actually reflected unwillingness of the area agencies on aging to try actively to increase minority participation.¹³

Administration on Aging

Under the Older Americans Act, one of the functions of the Administration on Aging is to provide technical assistance to the States to increase the participation of older minorities in Federal programs.¹⁴ The Administration on Aging attempts to achieve greater minority participation by holding public hearings, training State units on aging staff, training minority community members as senior volunteers, and by publishing materials that inform the public of Federal programs.¹⁵

Although officials stated that the Administration on Aging has provided technical assistance to State units on aging to help develop training manuals and program evaluation instruments that could be used to help to increase the participation of minority older persons,¹⁶ State units on aging reported that they re-

sion of services is contracted out by the area agency on aging to private nonprofit entities that often may not provide adequate participation figures to the area agency.

¹² *Minority Elderly Services.*

ceived little such technical assistance from the Administration on Aging (see table 4.3). When asked about specific types of training provided by the Administration on Aging, the majority of State units on aging reported that they had not received any technical assistance directed at increasing minority participation. For example, only two (4.0 percent) State units on aging reported that they received technical assistance from the Administration on Aging, such as help in training staff on techniques that would minimize cultural and ethnic barriers to participation by minorities. Results from the questionnaire also indicate that 43 State units on aging (86.0 percent) reported that they did not receive help from the Administration on Aging in designing or using needs assessment instruments directed at obtaining information on minority needs.

State Units on Aging

Technical assistance to help increase the participation of older minorities, provided by State units on aging to area agencies on aging, may include training local agency personnel and minority community people as senior volunteers, holding public meetings, and publishing materials directed toward minority older persons.¹⁷ Almost all State units on aging reported providing some type of technical assistance to area agencies on aging (see table 4.4). When State units on aging were questioned about the types of technical assistance they provided, 19 (38.0 percent) reported that they had

¹³ *Ibid.*

¹⁴ 42 U.S.C. §3026(a)(6)(B) (Supp. III 1976).

¹⁵ 42 U.S.C. §3012 (Supp. III 1976).

¹⁶ Kolb and Stovenour Interview.

¹⁷ 42 U.S.C. §3026 (Supp. III 1976).

Table 4.3**Types of Technical Assistance Received by State Units on Aging from the Administration on Aging**

Type of technical assistance	Number	Percent
Training on problems and approaches to service delivery using minority community resources (e.g., existing family and group support systems)	8	16.0*
Training in interpersonal skill building and interviewing techniques to minimize cultural and ethnic barriers	2	4.0
Holding community forums/talks on the needs of older minorities	6	12.0
Designing/using minority needs assessment/program evaluation instruments	3	6.0
Training of minority community people as senior advocates/volunteers	4	8.0
Federal help in other ways	1	2.0

n = 50

*This figure can be interpreted as follows: of the 50 State units on aging responding to the Commission's mail survey, 16 percent reported that they received training from Administration on Aging on approaches to service delivery using minority community resources.

Source: Data collected by the U.S. Commission on Civil Rights' survey of State units on aging, January 1981.

provided help in training staff on techniques to minimize cultural and ethnic barriers to participation; 17 (34.0 percent) stated that they provided aid in designing and using minority needs assessments and program evaluations. A majority of State units on aging, 31 (62 percent), provided area agencies with training for minority older persons as senior volunteers.

Area Agencies on Aging

Just as State plans provide for State units to give technical assistance to area agencies on aging, area agency plans contain guidelines for providing technical assistance to grantees and contractors and to other organizations concerned with the needs of older persons.¹⁸

¹⁸ U.S., Department of Health, Education, and Welfare, Office of the Secretary, Office of Human

Area agencies on aging reported that they received little technical assistance from the State units on aging regarding increasing the participation of minority older persons (see table 4.5). Although more than 39 percent of the State units on aging said they had provided technical assistance on interpersonal skill building and interviewing techniques to minimize cultural and ethnic barriers, 75.7 percent of the area agencies on aging reported they did not receive such technical assistance from the State unit on aging. The majority of area agencies, 166 (80 percent), reported that they did not receive help from the State units on designing and using minority needs assessments instruments; 47 (22.8 percent) reported that they received training of

Development, Administration on Aging, *Area Agency Assessment Guide* (February 1976), p. 34.

Table 4.4**Types of Technical Assistance Provided by State Units on Aging to Area Agencies on Aging**

Types of technical assistance	Number	Percent
Training on problems and approaches to service delivery using minority community resources (e.g., existing family and group support systems)	29	58.0*
Training in interpersonal skill building and interviewing techniques to minimize cultural and ethnic barriers	19	38.0
Holding community forums/talks on the needs of older minorities	26	52.0
Designing/using minority needs assessment/program evaluation instruments	17	34.0
Training of minority community people as senior advocates/volunteers	31	62.0

n = 50

*This figure can be interpreted as follows: of the 50 State units on aging responding to the Commission's mail survey, 58 percent reported that they provide training on approaches to service delivery using minority community resources.
Source: Data collected by the U.S. Commission on Civil Rights' survey of State units on aging, January 1981.

Table 4.5**Types of Technical Assistance Provided by Area Agencies on Aging to Grantees to Increase Participation of Minority Older Persons, 1978-80**

Types of technical assistance	Number	Percent
Training on problems and approaches to service delivery using minority community resources (e.g., existing family and group support systems)	76	36.9*
Training in interpersonal skill building and interviewing techniques to minimize cultural and ethnic barriers	85	41.3
Holding community forums/talks on the needs of older minorities	100	48.5
Designing/using minority needs assessment/program evaluation instruments	53	25.7
Talks with representatives of minority organizations in PSA (e.g., tribal governments, LULAC, Urban League)	131	63.6
Training of minority community people as senior advocates/volunteers	99	48.1

n = 206

*This figure can be interpreted as follows: in 1980, 36.9 percent of the area agencies on aging responding to the Commission's mail survey reported that they provided training to their grantees on approaches to service delivery using minority community resources.
Source: Data collected by the U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

minority community people as senior volunteers.

The Commission's survey sought to determine the types of technical assistance that area agencies provided to grantees and contractors to help increase minority participation. Eighty-five (41.4 percent) of the area agencies on aging reported providing training to service provider staff on interpersonal skill building and interviewing techniques to minimize cultural and ethnic barriers to participation (see table 4.5). The majority of area agencies on aging, 131 (63.6 percent), reported providing technical assistance through talks with representatives of minority organizations. Fifty-three (25.7 percent) of the area agencies on aging said they provide technical assistance to grantees on designing and using minority needs assessment and program evaluation instruments.

Minority Participation on Advisory Boards

Advisory councils, in keeping with Administration on Aging regulations, have been established to advise State units on aging and area agencies on aging on issues affecting older persons and to help in development and implementation of State and area plans.¹⁹ The councils hold public hearings, represent the interests of older persons, and review and comment on other State plans, budgets, and policies that affect older persons.²⁰

By Administration on Aging guidelines, at least half the members of advisory

council to State units on aging and area agencies on aging must be older persons who are consumers of services under the area plan.²¹ The Commission's study of six cities found that certain minority groups were not represented on the advisory councils. Failure to include minority older persons on the advisory councils that plan and implement services may help to determine the extent to which all minority older persons are restricted or excluded from full participation in Older Americans Act service programs.²²

Findings from the Commission's survey of State units on aging and area agencies on aging indicate that generally most minority groups are represented on the advisory councils at the State and local levels. However, Hispanics as a group are underrepresented. Data from the State and area questionnaires indicate that Hispanics represent 3.0 percent of the State unit on aging advisory council members and 2.6 percent of area agency on aging advisory council members.

Barriers to Minority Participation **Identification of Barriers by State Units on Aging**

The Commission's survey of 50 State units on aging examined barriers identified by the State units as directly or indirectly inhibiting full participation of older minorities in Older Americans Act programs. According to the data collected from the State units on aging questionnaires, 47 (94.0 percent) of the State

¹⁹ *Minority Elderly Services*, p. 8, and Administration on Aging, *State Plan on Aging Under Title III of the Older Americans Act, Fiscal Years 1981-1983*. See app. A.

²⁰ See app. A.

²¹ 45 C.F.R. §§1321.15-29, 1321.77-81 (1980).

²² *Minority Elderly Services*.

units reported that there are some barriers to the full participation of older minorities in social service and nutrition programs (see table 4.6). The two barriers most often identified by the State units on aging were: (1) that minority older persons have a general feeling of not being welcome in certain programs and (2) that transportation to the service location is inadequate. Location of programs outside of minority communities and staffs' inadequate knowledge of minority language and cultural differences also were identified by State units on aging as barriers to full participation of older minorities in many States.

Identification of Barriers by Area Agencies on Aging

The Commission also asked area agencies on aging about barriers that directly or indirectly inhibit the full participation of older minorities in social service and nutrition programs. Of 206 agencies in the survey, 178 (86.4 percent) said that there are some barriers to full participation of older minorities (see table 4.7). Inadequate transportation to service locations was identified by 120 (58.8 percent) area agencies on aging as a barrier. Many area agencies, 112 (54.9 percent), reported that minority older persons have general feelings of not being welcome in certain programs; this, combined with transportation problems, can inhibit full participation of older minorities in social service and nutrition programs.

Outreach Efforts to Increase Minority Participation

The Commission's six-cities study indicated that older minorities often felt that

Older Americans Act programs were unresponsive to their needs and priorities. In most cities, little written material about programs was available in English, and even less in other languages. Very little other publicity (e.g., media spots, displays) was available about the programs, and again, especially in languages other than English. In most of the six cities, information and referral services generally did not have any bilingual employees. Commission staff found that, despite low participation by minority elderly in most service programs, area agencies on aging were not actively involved in specific outreach activities to include more minority elderly.

Administration on Aging

Representatives of the Administration on Aging stated that the agency, in its efforts to inform the general public of services available under the Older Americans Act, has done nothing specifically directed at reaching minority older persons.²³ Instead, the Administration on Aging has established a mechanism for reaching minority elderly through its funding of national minority aged organizations.²⁴ The Administration on Aging reported that these national organizations have developed posters and pamphlets that are directed to older minorities.²⁵ However, the Administration on Aging does not monitor these organizations to determine that minorities, in fact, are being made aware of the Older Americans Act programs.

State Units on Aging

State units on aging were questioned about their outreach efforts to inform

²³ Kolb and Stovenour Interview.

²⁴ Ibid.

²⁵ Ibid.

Table 4.6**Barriers Identified by State Units on Aging as Directly or Indirectly Inhibiting Full Participation of Older Minorities in Service Programs, 1980**

Types of barriers	Total number	Very serious barrier	Moderate barrier	Minor barrier	No barrier
Existence of English-speaking staff only	# 48 % (100.0)	0 (0.0)	13 (27.1)	12 (25.0)	23 (47.9)*
Location of programs outside of minority areas	49 (100.0)	2 (4.0)	12 (24.5)	19 (38.8)	16 (32.7)
Contributions for meals needed from participants	47 (100.0)	0 (0.0)	6 (12.8)	9 (19.1)	32 (68.11)
Adequate transportation not provided to service locations	48 (100.0)	7 (14.6)	15 (31.3)	14 (29.1)	12 (25.0)
Existing support systems in minority community not utilized	42 (100.0)	1 (2.4)	14 (33.3)	11 (26.2)	16 (38.1)
Minority older persons have general feeling of not being welcome in certain programs	45 (100.0)	4 (8.9)	18 (40.0)	14 (31.1)	9 (20.0)
Programs have stigma of welfare image	46 (100.0)	2 (4.3)	8 (17.4)	16 (34.8)	20 (43.5)
Staff lacks adequate knowledge of minority language/cultural differences	47 (100.0)	3 (6.4)	9 (19.1)	19 (40.4)	16 (34.1)
Suspicion of older minorities of government programs	42 (100.0)	1 (2.4)	13 (31.0)	9 (21.4)	19 (45.2)

*This figure can be interpreted as follows: in 1980, 47.9 percent of State units on aging responding to the Commission's mail survey reported that the existence of English-speaking staff only was not a barrier inhibiting the full participation of older minorities in their service programs.
 Source: Data collected by the U.S. Commission on Civil Rights' survey of State units on aging, January 1981.

Table 4.7**Barriers Identified by Area Agencies on Aging as Directly or Indirectly Inhibiting Full Participation of Older Minorities in Service Programs, 1980**

Types of barriers	Total number	Very serious barrier	Moderate barrier	Minor barrier	No barrier
Existence of English-speaking staff only	# 198 % (100.0)	7 (3.5)	18 (9.1)	39 (19.7)	134 (67.7)*
Location of programs outside of minority areas	204 (100.0)	8 (3.0)	23 (11.3)	42 (20.5)	133 (65.2)
Contributions for meals needed from participants	204 (100.0)	4 (1.9)	3 (1.5)	34 (16.6)	163 (80.0)
Adequate transportation not provided to service locations	204 (100.0)	19 (9.3)	52 (25.5)	49 (24.0)	84 (41.2)
Existing support systems in minority community not utilized	185 (100.0)	10 (5.4)	35 (19.0)	56 (30.2)	84 (45.4)
Minority older persons have general feeling of not being welcome in certain programs	180 (100.0)	12 (6.3)	46 (24.2)	54 (28.4)	78 (41.1)
Programs have stigma of welfare image	198 (100.0)	7 (3.5)	27 (13.6)	66 (33.3)	98 (49.5)
Staff lacks adequate knowledge of minority language/cultural differences	194 (100.0)	5 (2.6)	29 (15.0)	47 (24.2)	113 (58.2)
Suspicion of minority older persons of government programs	177 (100.0)	9 (5.1)	32 (18.1)	49 (27.7)	87 (49.1)

*This figure can be interpreted as follows: in 1980, 67.7 percent of area agencies on aging responding to the Commission's mail survey reported that the existence of English-speaking staff only was not a barrier inhibiting the full participation of older minorities in their service programs.
Source: Data collected by the U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

minority older persons of service programs (see table 4.8). Forty-seven (94.0 percent) of the State units on aging reported using some form of publicity to inform older persons of the Title III service programs and to educate the general public about the needs of minority elderly. Twenty-three (46 percent) of the State units used a language other than English to inform the general public about their service programs. Findings from the survey show that it is not the policy of 40 (80.0 percent) of the State units on aging to provide a translator or bilingual interpreter at all their public hearings on service programs. Forty-nine (98.0 percent) of the State units on aging did not translate their State plans or publish them in languages other than English.

Area Agencies on Aging

Area agencies on aging were also questioned about their outreach efforts to inform older minorities about service programs. According to the data collected, 198 area agencies on aging (96.1 percent) used English in publicity, and 91 (44.2 percent) used languages other than English (see table 4.9). The survey showed that it is not the policy of 170 (82.5 percent) of the area agencies on aging to provide a translator or bilingual interpreter at all area agency public hearings. Of the 206 area agencies on aging surveyed, 200 (97.1 percent) indicated they did not translate or publish their area plans in a language other than English.

Summary

Although the Administration on Aging funds service programs at the State unit on aging and area agency on aging levels,

it does not do any indepth monitoring to determine whether older minorities are being provided the services for which the State units and area agencies are being funded or to what extent older minorities are aware that these programs exist.

Monitoring and evaluation by Administration on Aging officials of Federal programs for the aging at the State level entails completing checklists that are part of a general assessment guide, reviewing program performance reports, holding public hearings, and contacting national minority organizations for older persons. Administration on Aging regional staffs also visit individual State units on aging annually and spotcheck area agencies on aging to determine whether older minorities are receiving services.

One of the functions of the Administration on Aging is to provide technical assistance to the State units on aging in an effort to increase the participation of older minorities in Federal programs. The absence of a formal mechanism for providing technical assistance is evident at the Federal, State, and local levels. Results from the mail survey indicated that only a few State units on aging reported receiving such technical assistance from the Administration on Aging. For example, the results from the Commission's survey of State units on aging indicate that only two State units on aging received technical assistance from the Administration on Aging in the area of helping to train staff on techniques to minimize cultural and ethnic barriers to participation. Although the majority of State units on aging reported that they provided technical assistance to the area agencies on aging, the majority of area

Table 4.8**Outreach Efforts by State Units on Aging to Inform Minority Older Persons of Service Programs, 1980**

Type of publicity	English	Language other than English
Recorded telephone messages	# 7 % (13.0)	2 (3.7)*
Posters/displays/leaflets in public places (include minority organizations/offices)	39 (72.2)	21 (38.9)
Advertisement or articles in local minority newspapers	31 (57.4)	15 (27.8)
Advertisement or article in newsletters distributed to local residents/participants	39 (72.2)	12 (22.2)
People speaking at meetings of clubs and other organizations	47 (87.0)	16 (29.6)
Local radio/television announcements	42 (77.8)	8 (14.8)

*This figure can be interpreted as follows: in 1980, 3.7 percent of State units on aging responding to the Commission's mail survey reported that they used recorded telephone messages in a language other than English to inform minority older persons of service programs.

Source: Data collected by the U.S. Commission on Civil Rights' survey of State units on aging, January 1981.

Table 4.9**Outreach Efforts by Area Agencies on Aging to Inform Minority Older Persons of Service Programs, 1980**

Type of publicity	English	Language other than English
Recorded telephone messages	# 34 % (16.5)	4 (1.9)*
Posters/displays/leaflets in public places (include minority organizations/offices)	195 (94.7)	82 (39.8)
Advertisement or articles in local minority newspapers	12 (59.5)	36 (17.6)
Advertisement or articles in newsletters distributed to local residents/participants	190 (92.2)	44 (21.4)
People speaking at meetings of clubs and other organizations	192 (93.2)	49 (23.8)
Local radio/television announcements	185 (89.8)	39 (18.9)

*This figure can be interpreted as follows: in 1980, 1.9 percent of area agencies on aging responding to the Commission's mail survey reported that they used recorded telephone messages in a language other than English to inform minority older persons of service programs.

Source: Data collected by the U.S. Commission on Civil Rights' survey of area agencies on aging, January 1981.

agencies reported that they received little technical assistance from the State units. For example, in the Commission survey of area agencies on aging, 156 (75.7 percent) indicated that they had not received technical assistance from State units on aging in training on interpersonal skill building and interview techniques to minimize cultural and ethnic barriers to participation.

In the survey, area agencies on aging and State units on aging questionnaires identified the major barriers prohibiting older minorities from full participation in Federal programs as: (1) inadequate transportation to service locations, (2) a general feeling of not being welcome in

certain programs, (3) location of programs outside of minority communities, and (4) staffs' inadequate knowledge of minority language and cultural differences.

Finally, most program administrators in areas with sizable populations of limited-English-speaking elderly only use English in their publicity efforts to inform older persons of available programs. None of the State units or the area agencies on aging has a policy requiring a bilingual interpreter at their public hearings, nor are State or area plans translated and published in languages other than English.

Conclusion, Findings, and Recommendations

Conclusion

Congress mandated that the Commission investigate minority participation in Older Americans Act programs. Although the Commission's investigation of federally assisted programs did not document the existence of discrimination against minorities, it is evident that congressional concern about the lack of minority participation in Older Americans Act programs is justified. Participation of minorities in Older Americans Act programs is a right yet to be fully realized.¹

The data collected in both phases of the Commission's investigation strongly suggest that the policies and practices generally followed by Administration on Aging officials, State units on aging, area agencies on aging, and service providers in employment, contracts, and services adversely affect minority participation in Older Americans Act programs. Although some minorities are included among Older Americans Act employees,

rarely are American Indians/Alaskan Natives, Asian and Pacific Island Americans, and Hispanics involved in key decisionmaking positions. Although almost all agencies funded under the Older Americans Act had affirmative action plans, many of the plans did not include specific goals and timetables for hiring, promoting, and training minorities. In instances where goals and timetables had been established, less than half of the agencies and service providers had met them. Older Americans Act programs generally did not have bilingual employees, although a need for them was often evident. Despite the need, nowhere was there a requirement for any bilingualism among program staff.

The Commission found that despite the fact that minority organizations were often in a position to render unique services (e.g., information and referral and ethnic meals), minority firms received few Title III and Title IV awards under the Older Americans Act. Even

¹ Leaders actively involved with older Americans' concerns, as evidenced by those participating in the White House Conference on Aging, failed to include minority issues more than peripherally in the four-volume report of the conference. Such unresponsiveness among lead-

ers in the field of aging may provide some indication of why minorities are not participating in programs at the local and State levels. See, *Final Report of the 1981 White House Conference on Aging* (June 1982).

though minority organizations had low representation among Title III- and Title IV-funded groups, few formal mechanisms existed to increase their participation.

The Commission also found that in almost every city visited, older minorities generally were not participating fully in the available programs. Although few minorities participated in Older Americans Act programs, little outreach to minority elderly existed.

Based on the Commission's investigation of Older Americans Act programs and its finding of limited participation of minorities, the Commission questions the efficacy of the removal in 1978 of several statutory provisions and sections of the act that referred explicitly to the inclusion of minorities in Older Americans Act programs.² Since the Commission found a seeming disregard for responsibilities by program administrators to enforce compliance with Title VI of the Civil Rights Act of 1964, the Commission also questions the commitment of program administrators to minority participation in Older Americans Act programs without such legislation.

The Commission strongly urges that legislation be reinstituted clearly evi-

dencing congressional intent that minorities fully participate in available Older Americans Act programs. Such legislation needs to be supported by regulations and program directives by the Administration on Aging specifically providing for full minority participation. Regulations also must include provisions for effective monitoring and implementation of Older Americans Act programs as they affect minorities. Congress' immediate attention to these concerns is especially important given the dramatic rise in the number and proportion of minority elderly in the population, their real needs, and the limited role they are currently accorded in relevant programs. In the context of current economic realities, where social programs generally are sustaining cuts, persons no longer eligible for other programs will be vying for scarce resources that remain available under Older Americans Act programs. Congress must act aggressively to make unequivocal its intent that greater participation of minorities in Older Americans Act programs in the future is an imperative. Even in the absence of legislation, the Administration on Aging should meet its responsibilities under Titles VI and VII of the Civil Rights Act

² For example, the 1975 amendments to the model project provisions of the Older Americans Act provided that the Commissioner on Aging must give special consideration to projects that provided needed services to minorities, American Indians, and limited-English-speaking elderly. Pub. L. No. 94-135, Title I, §108, 89 Stat. 713, 717 (repealed in 1978). The 1978 amendments removed these provisions. The Administration on Aging, following Congress' lead, revised the Older Americans Act regulations to eliminate requirements for establishing preferences or priorities for minorities. For example, compare 45 C.F.R. §1321.83 (1980) to 42 Fed. Reg. 59, 212, 59,

225 [45 C.F.R. §1321.79(c)] (1977) (since repealed) and compare 45 C.F.R. §1321.25 (1980) to 42 Fed. Reg. 59, 212, 59, 219, [45 C.F.R. §1321.12(b)(1)] (1977) (since repealed). For instance, the regulations issued under the 1978 amendments had no explicit requirement for minority participation in grants and contracts. 45 C.F.R. §1321.101-103 (1980). The prior regulations at 45 C.F.R. §1321.80(c) required area plans to "provide for contracts or grants under the area plan to be operated by minority individuals, at least in proportion to their relative number in the planning and service area." 42 Fed. Reg. 59, 212, 59, 226 (1977) (since repealed).

of 1964 by adopting and distributing guidelines and monitoring their implementation.

The next section presents findings from both phases of the Commission's investigation. It is followed by specific Commission recommendations for action.

Findings

Employment

Minority Representation in Employment

1. Minorities, other than blacks, are seldom employed at the Administration on Aging, State units on aging, and area agencies on aging. Blacks, while employed, are not being fully utilized at all levels at the Administration on Aging, State units on aging, and area agencies on aging.

● Minorities constituted 49.6 percent of the work force employed by the Administration on Aging. Blacks accounted for 91 percent of minorities employed by the Administration on Aging. They held 90.0 percent of all clerical positions and 100 percent of all paraprofessional positions. Hispanics and Asian and Pacific Island Americans each accounted for 1.8 percent of the work force employed by the Administration on Aging, and American Indians and Alaskan Natives accounted for 0.9 percent.

● At the time of the survey more than 96 percent (26) of persons employed in the lowest salary ranges at the Administration on Aging were minority. In comparison, only one white employee was at this level.

● Minorities constituted 16.4 percent of the persons employed by State units on aging. Of the minorities employed, blacks accounted for 11.1 percent, His-

panics 2.4 percent, and Asian and Pacific Island Americans 2.1 percent. American Indians/Alaskan Natives made up less than 1 percent of the work force.

● Minorities were 21.0 percent of the persons employed by area agencies on aging. Blacks accounted for 17.1 percent, Hispanics 2.4 percent, Asian and Pacific Island Americans 1.1 percent, and American Indians/Alaskan Natives accounted for less than 1 percent. More than half of all minorities employed by area agencies in the survey were employed in paraprofessional and clerical positions.

Bilingual Staff

2. Despite Federal regulations that require bilingual services for older persons who do not speak English as their principal language, the Administration on Aging has no specific policies or practices regarding the employment of bilingual staff, nor does the Administration on Aging issue guidelines to Older Americans Act program administrators on the need to hire bilingual staff.

● The Commission's six-city investigation found that area agencies on aging usually do not have bilingual staff, and in none of the cities was there a requirement for bilingual skills among program staff, even though provisions of the Older Americans Act require bilingual services for older persons who do not speak English as their principal language.

Affirmative Action

3. The Administration on Aging is covered by the departmentwide regulations of the U.S. Department of Health and Human Services that require all agencies authorized under the Older Americans Act to develop and maintain affirmative action plans for equal em-

ployment opportunity. In addition, the Older Americans Act gives the Administration on Aging the authority to provide leadership and guidance to agencies on aging in designing, implementing, and evaluating their affirmative action obligations. The Administration on Aging, however, provides little assistance or active support to State units or area agencies on aging in implementing their affirmative action objectives.

4. Although all State units and almost all area agencies on aging in the survey reported having affirmative action plans, their plans did not generally require specific affirmative action efforts, such as hiring, promotion, and training goals and timetables for minorities.

5. The Commission's case analyses reveal that although most area agencies on aging reported having affirmative action plans, almost none had been successful in achieving their affirmative action goals.

6. Although the Older Americans Act gives the Administration on Aging authority to take corrective action when agencies on aging fail to comply with employment provisions of Title III of the Older Americans Act, the six-city investigation found that in no instance where affirmative action goals established by area agencies on aging were unmet had substantive corrective action been required by the Administration on Aging.

Grants and Contracts Minority Representation Among Grantees and Contractors

1. Minority organizations receive limited funds under the Older Americans Act.

- In each of the six communities visited, minority organizations received a small percentage of the available Title III funds, despite the fact that minority organizations often were in a position to render unique services (e.g., escort, information and referral, and ethnic meals) and had displayed the ability to provide services effectively for achieving Title III objectives.

- In 1980, of the funds made available by area agencies on aging under Title III of the Older Americans Act, American Indian/Alaskan Native organizations received 0.3 percent; Asian and Pacific Island American, 0.5 percent; black, 6.9 percent; and Hispanic, 1.6 percent.

- In 1980, of funds made available under Title IV of the Older Americans Act, American Indian/Alaskan Native organizations received 1.2 percent; Asian and Pacific Island American, 0.7 percent; black, 4.0 percent; and Hispanic, 1.9 percent.

Outreach to Minority Organizations

2. Program administrators are not providing adequately for increased participation of minority organizations.

- Despite low participation of minority organizations as recipients of Older Americans Act funds, program administrators rarely attempt active outreach efforts.

- Program administrators have instituted few formal mechanisms to provide technical assistance to potential minority grantees and contractors. In the six-city investigation, the failure to provide such technical assistance was cited by representatives of minority organizations as one reason they did not receive Title III funds.

- The Administration on Aging has not assumed responsibility for outreach to minority organizations, nor has it encouraged State and area agencies on aging to provide technical assistance to increase minority participation.

Monitoring of Grantees and Contractors

3. Program administrators generally do not monitor Older Americans Act-funded organizations to determine whether they comply with Title VI of the Civil Rights Act of 1964.

- The Administration on Aging, State units on aging, and area agencies on aging reported that their monitoring of service providers was mainly concerned with budget constraints and fiscal audits and was generally not related to compliance with Title VI of the Civil Rights Act of 1964.

- Once a Title IV award is made, the Administration on Aging does not usually monitor Title IV recipients to determine their compliance with Title VI of the Civil Rights Act of 1964.

- The Administration on Aging keeps no records of awards made to minority organizations under Title III.

- Most State units on aging reported that they did not keep records on the number of Title III awards made to minority organizations and did not require their area agencies on aging to submit this information to them.

Services

Monitoring and Evaluation

1. Results from the Commission's investigation in six cities indicated that program evaluation as it relates to effectiveness of services to minorities was not a high priority for most area agencies on

aging visited. Although the six area agencies on aging indicated that they did monitor their programs, their evaluations did not include assessment of the participation of minority elderly.

Technical Assistance

2. Since the 1978 amendments, no official guidelines have been issued at any level for the provision of technical assistance to encourage minority elderly participation in Older Americans Act programs.

- The Administration on Aging did not have written policies on provision of technical assistance to State units on aging. The State units on aging did not have any written policies on provision of technical assistance to area agencies on aging. The area agencies on aging did not have written procedures for provision of technical assistance to service providers.

3. Respondents at different levels gave inconsistent responses to inquiries about the provision of technical assistance by the Administration on Aging to State units on aging.

- Although Administration on Aging officials reported that they provided technical assistance to all State units on aging, aimed at increasing minority participation in service programs, only a small number of State units on aging reported in the mail survey that they had received technical assistance from the Administration on Aging.

Barriers to Minority Participation

4. Inadequate transportation is a major barrier to participation of older minorities in nutrition and social service programs. Both State units on aging and area agencies on aging identified transportation as limiting participation of

minorities in social service and nutrition programs.

● Other barriers most often identified by State units and area agencies on aging were (1) that minority older persons have a general feeling of not being welcome in certain programs, (2) location of programs outside of minority areas, and (3) existing support systems in minority communities were not utilized, and staffs had inadequate knowledge of minority language and cultural differences.

Outreach Efforts

5. Representatives of the Administration on Aging stated that the Administration on Aging, in its efforts to inform the general public of services available under the Older Americans Act, has done nothing specifically directed towards reaching minority older persons.

6. The Administration on Aging has established a mechanism for reaching the minority elderly through its funding of national minority aged organizations. However, the Administration on Aging does not monitor these organizations to determine that minorities, in fact, are being made aware of the Older Americans Act programs.

7. Program administrators at State and local levels provide little information about Older Americans Act programs in languages other than English, even where necessary.

● The Commission's six-city investigation found that little written material about area agencies on aging programs was available in English, and even less in other languages. Very little other publicity (e.g., media spots, displays) was available about the programs, and again,

especially in languages other than English.

● In responding to the mail survey, the majority of program administrators in areas with a sizable population of limited-English-speaking elderly use only English in their efforts to inform older persons of available programs. None of the State units on aging and the area agencies on aging have a policy requiring a bilingual interpreter at public hearings, nor are State or area plans translated and published in languages other than English.

Recommendations

Employment

Minority Representation in Employment

1. The Administration on Aging, the State units on aging, and the area agencies on aging should examine the composition of their work forces to ascertain the extent to which minorities are represented at all levels of employment. The Administration on Aging should adopt positive recruitment, training, job placement, and other measures needed to increase the employment of those minorities that are underutilized.

Bilingual Staff

2. The Administration on Aging should adopt criteria to determine the need for bilingual personnel in Older Americans Act programs. As stipulated in provisions of Title III of the Older Americans Act, the Administration on Aging should adopt employment policies that ensure that bilingual legal assistance and information and referral services will be provided. The Commission's six-city investigation reported evidence of the special problems of language-mi-

nority older persons. Despite the participation of older minorities who do not speak English as their principal language in federally assisted programs, the Administration on Aging has failed to provide these older persons with bilingual services. The study documented that the lack of availability of bilingual legal and information and referral services has limited the participation of language-minority citizens in those Older Americans Act programs, thus negating for them the opportunity for receiving full benefits under these programs in the six cities.

Affirmative Action

3. The Administration on Aging should express a commitment to equal employment opportunity by establishing rigorous organizational policies and practices in support of affirmative action efforts. The Administration on Aging should reinforce this commitment by issuing policy directives to agencies on aging about their affirmative action obligations and accountability. The Administration on Aging should develop for use by agencies on aging effective strategies for successful implementation of affirmative action goals. Although the Administration on Aging is governed by departmentwide affirmative action guidelines that cover all divisions of the Department of Health and Human Services, provisions of the Older Americans Act give the Administration on Aging the authority to provide tangible direction, technical assistance, and encouragement to agencies on aging in their efforts to implement affirmative action policies. The Administration on Aging, however, has not designed or implemented an internal monitoring or compliance sys-

tem to uncover discriminatory employment practices. Under provisions of the Older Americans Act, the Administration on Aging has the responsibility to take corrective action to resolve situations in which there is failure to comply with affirmative action requirements.

Grants and Contracts Minority Representation Among Grantees and Contractors

1. Congress should amend the Older Americans Act to include statutory provisions for minority participation in grants and contracts.

Data received from the Administration on Aging, State units on aging, and area agencies on aging indicate that despite the availability of minority resources, minority organizations generally are conspicuously absent as Title III and Title IV awardees under the Older Americans Act. Amendments to the Older Americans Act in 1978 deleted several statutory provisions and sections of the law that referred explicitly to inclusion of minorities in Older Americans Act programs. Since the passage of the amendments, the Administration on Aging has revised the Older Americans Act regulations to eliminate requirements for establishing priorities for minorities, with the result that the Administration on Aging, State units, and area agencies on aging have abdicated responsibility existing under Title VI of the Civil Rights Act of 1964 and provisions of the Older Americans Act to help assure equal opportunity in the programs under the act.

Outreach and Technical Assistance to Minority Organizations

2. The Administration on Aging and its agencies should develop more active outreach and technical assistance to minority organizations that would bring more of them into the contracting process.

Outreach efforts should be expanded to include, for example, increased placement of advertisements in relevant media soliciting applications from minority organizations for Title III and IV funds, and notification to minority firms, which produce specific services, of contracts for bid in areas of their speciality to help ensure that they are made aware of fund availability. Technical assistance should be expanded to increase the number of seminars for informing minorities on preparation of bids and proposals in an effort to increase the existing pool of eligible minority applicants and thus the possibility of their selection as grantees and contractors.

Monitoring of Grantees and Contractors

3. The Administration on Aging should require regular reviews of compliance activities by its agencies and should assume an active role in coordinating and monitoring the reviews to demonstrate to program administrators its commitment to increasing minority participation.

Program administrators should be required to keep records on the number and amount of awards given to minority organizations, to keep reasons for rejection of minority firms as Older Americans Act recipients, and to keep information on outreach efforts made to encourage minority organizations' participation

in Older Americans Act programs. This information should be reported regularly to program administrators and be evaluated in assessing the adequacy of performance by them under affirmative action guidelines. If there are findings of non-compliance with Title VI of the Civil Rights Act of 1964, the Administration on Aging should inform the Office for Civil Rights, U.S. Department of Health and Human Services, and refer the matter for appropriate enforcement action.

Services Technical Assistance

1. The Administration on Aging should establish a formal mechanism for providing technical assistance to State units on aging and area agencies on aging designed to increase minority participation in service programs. Guidelines should be issued by the Administration on Aging to all State units on aging requiring that they provide technical assistance to area agencies on aging to increase minority participation in service programs. Both the Administration on Aging and State units on aging should hold public hearings designed specifically to solicit minority views for planning service programs to increase minority elderly participation. The Administration on Aging and State units on aging also should hold training workshops for area agencies on aging directed at helping them to increase minority participation in service programs.

Barriers to Minority Participation

2. The Administration on Aging should establish written procedures to help ensure that State units on aging and area agencies on aging encourage use of Federal funds for development of

public transportation systems that will enable older minorities to participate more easily in Older Americans Act programs.

Outreach Efforts

3. The Administration on Aging should monitor regularly the State units on aging and the area agencies on aging to make sure these agencies use not only

English but also other appropriate languages in materials they disseminate. In addition, various types of publicity should be offered in English and other languages appropriate for the locations. State units on aging and area agencies on aging should be required to have interpreters at all public hearings and translations of all State and area plans.

Appendix A

Glossary

The following glossary contains definitions of selected terms as they were used throughout this report.

Affirmative Action

Plans: Goals and/or timetables for minority participation.

Goals: Objectives targeting specific racial and ethnic minorities for hiring, promotion, and training opportunities who have been underutilized because of past discrimination. Goals differ from quotas since they do not require a specific percentage to be reached.

Timetables: Specific time periods during which goals are to be reached to hire, train, and promote racial and ethnic minorities targeted for affirmative action.

Administration on Aging (AoA): The agency established in the Office of the Secretary, Department of Health and Human Services (HHS), as part of the Office of Human Development Services, which is responsible for administering the provisions of the Older Americans Act.

Area Agency on Aging (AAA): Agency designated by the State agency in a planning and service area to develop and administer the area plan for a comprehensive and coordinated system of services for older persons.

Area Agency Advisory Council: Council whose membership is composed

of persons interested in the aging network of which at least 50 percent of the membership must be older persons whose purpose and function is to advise the area agency to help the AAA: (1) develop and implement the area plan, (2) conduct public hearings, (3) represent the interests of older persons, (4) review and comment on other State plans, budgets, and policies that affect older persons.

Chore Maintenance Services: Performance of household tasks, essential shopping, household and home repairs, and other light work necessary to enable older individuals to remain in their own homes, when, because of frailty or other conditions, they are unable to perform such tasks or obtain the service otherwise.

Clericals: Persons who perform general office work, includes, for example, file clerks, office machine operators, stenographers, and typists.

Commissioner: The Commissioner on Aging of the Administration on Aging, Department of Health and Human Services (HHS).

Community Focal Point for Service Delivery: A place or mobile unit in a community or neighborhood designated by the area agency to collocate and coordinate service delivery to older persons to facilitate ready access to services.

Comprehensive and Coordinated System: A program of interrelated social and nutrition services for older persons in a planning and service area.

Compliance Review: Method for determining whether required Older Americans Act standards are met. These reviews are conducted by Federal, State, and area agencies.

Congregate Meals: Meals provided in a group setting.

Contractor/Grantee: Any organization or agency operating under contract or grant from either a State unit on aging or area agency on aging.

Subcontractor/Subgrantee: An organization or agency having a grant or contract with a prime grantee or contractor or another subcontractor for provision of supplies or services required for the performance of a State unit on aging or area agency on aging contract or grant.

Counseling Services: Activities to provide direct guidance and assistance to older persons in the utilization of needed health and social services and to help older persons cope with personal problems that threaten their health and ability to function in society.

Day Care Services: A comprehensive set of activities provided for frail individuals for a defined portion of a 24-hour day as a supplement for family care in a protective setting for purposes of personal attention, care, and supervision.

Employment Services: Services to assist older persons in retaining, regaining, or securing full or partial employment, or training or education leading to employment. Activities may include assessment, counseling, referral to community resources, provision of needed sup-

portive services, job development, job placement, and followup.

Evaluation: The formal appraisal and study of the operation and value (effectiveness) of a program.

Federal Fiscal Year: The Federal fiscal year is October 1 to September 30.

Greatest Economic Need: The need resulting from a level of income at or below the poverty threshold that is established by the U.S. Bureau of the Census.

Greatest Social Need: The need caused by noneconomic factors, which include physical and mental disabilities, language differences, and cultural or social isolation, including that caused by racial or ethnic status, that restrict an individual's ability to perform normal daily tasks or that threaten his or her capacity to live independently.

Health Maintenance Care: Services to detect or prevent illnesses that occur most frequently in older individuals.

Health Services: Services to assist older individuals in avoiding institutionalization because of health-related problems, including preinstitutional evaluation and screening and home health services.

Home-Delivered Meals: Meals delivered to a person's home.

Home Health Aide Services: Activities that provide basic health services to older persons who can be cared for at home. The home health aide should have specialized training in dealing with the health and health-related problems of older persons.

Homemaker Services: Services provided in older persons' homes, including the performance of or instruction in activities such as personal care, home

management, household maintenance, and hygiene by trained and supervised homemakers to help maintain, strengthen, and safeguard the older persons' personal functioning in their own homes.

Housing and Home Maintenance and Repair Programs: Services to assist older individuals to obtain adequate housing, including residential repair and renovation projects designed to enable older individuals to maintain their houses in conformity with minimum housing standards or to adapt homes to meet the needs of older individuals suffering from physical disabilities.

Indian Tribes: Any tribe, band, Nation, or other organized group or community of Indians that is eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

Information and Referral Services: A system of services to link people in need of services to appropriate resources. They are designed to ensure that all older persons within the planning and service area have knowledge of and reasonably convenient access to all services. In areas where a significant number of older persons do not speak English as their principal language, the service provider must provide information and referral services in the language spoken by the older persons.

Legal Services: Assistance in securing the rights, benefits, and entitlements of economically or socially needy older persons through legal advice and representation by an attorney (or legal counseling and representation by a nonattorney where permitted by law).

Meals on Wheels: Home-delivered nutrition services for seniors who cannot attend the congregate meals programs.

Minorities: American Indians and Alaskan Natives, Asian and Pacific Island Americans, blacks, Euro-ethnics, and Hispanics.

American Indian or Alaskan Native: A person having origins in any of the original peoples of North America and who maintains cultural identification through tribal affiliation or community recognition.

Asian or Pacific Island American: A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands, and Samoa.

Black: A person having origins in any of the black racial groups of Africa.

Euro-Ethnic: A person having origins in any of the countries of southern or eastern Europe.

Hispanic: A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

Minority Organization: An organization whose board of directors or other similar policymaking body is at least 50 percent minority and whose total staff is composed of at least 50 percent minorities (as defined above).

Minority-Owned Firm: A sole proprietorship owned by a minority; a partnership where more than 50 percent of the interest is owned by minorities or a corporation where more than 50 percent of the outstanding stock is owned by minorities.

Monitor: To watch, observe, or check the operations of a program in an informal or formal way.

Multipurpose Senior Center: A community or neighborhood facility for the organization and provision of a broad spectrum of services, including health, social, nutritional, and educational services, and a recreational facility for older persons.

Needs Assessment: Reasonable and objective method for determining the needs of all eligible residents of a geographic area, e.g., survey, telephone interviews, etc.

Nursing Home Ombudsman Service: Services of an ombudsman at the State level to receive, investigate, and act on complaints on behalf of older individuals who are residents of long-term care facilities and to advocate the well-being of such individuals.

Nutrition Services: The area agency may award funds for the provision of meals and other related services (including outreach and nutrition education) to older persons. The area agency must assure that both congregate and home-delivered meals are provided.

Older Americans Act (OAA): Enacted by Congress in 1965, it has been amended nine times. On October 18, 1978, the President signed the latest amendments. The act is designed to provide assistance through grants to States for programs to help older persons.

Older Persons: Those individuals who are 60 years of age or older.

Outreach: The active effort to identify the unserved older population, to inform these individuals of the community resources and services available to them, to

assess their needs, and to assist them in gaining access to needed services. Includes activities involved in publishing and circulating a newsletter that informs older persons of the community resources and services available to them.

Paraprofessionals: A paraprofessional is a trained aide who assists a professional.

Planning and Service Area (PSA): A geographic area of a State that is designated for planning, development, delivery, and overall administration of services for older persons under an area plan.

Professional: Occupations requiring either college graduation or experience that provides a comparable background. Includes persons who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of a State unit on aging's operations. Includes, for example, program directors, planners, nutritionists, nurses, and social workers.

Protective Services: Protective services are services designed to help those older persons who, because of physical or mental infirmity, may be unable to conduct the normal and necessary activities of their daily lives without such assistance.

Reservation: Any federally or State-recognized Indian tribe's reservation, pueblo, or colony, including former reservations in Oklahoma, Alaskan Native regions established pursuant to the Alaska Native Claims Settlement Act, and Indian allotments.

Seniors Advocates: Persons who, on behalf of older Americans, advocate for

the initiation or alteration of programs and policies that affect older persons.

Senior Citizen Recreation Programs: Services that enable older individuals to attain and maintain physical recreation and mental well-being through programs of regular physical activity and exercise.

Service Provider: An entity that is awarded a grant or contract from an area agency to provide services under the area plan.

State Unit on Aging: The single State agency designated to develop and administer the State plan of the OAA and to be the focal point on aging in the State.

State Advisory Council on Aging: Council that advises and helps the State agency to: (1) develop and implement the State plan, (2) conduct public hearings, (3) represent the interests of older persons, and (4) review and comment on other State plans, budgets, and policies that affect older persons.

State Plan: The document submitted by a State to AoA to receive grants from its allotments under the Older Americans Act. It contains provisions required by the act and the implementing regulations, including assurances that the State agency will administer or supervise the administration of activities funded under this act in accordance with all Federal requirements.

Telephone Reassurance: Services that provide calls at specified times, as often as necessary, to or from individuals who live alone to determine if they are safe and well.

Title III-Funded Organization: Any organization or agency operating under contract or grant from either a State unit on aging or area agency on aging.

Title III of the "Older Americans Act Amendments of 1978," Pub. L. No. 95-478, 92 Stat. 1517 (1978): Provides for formula grants to State agencies on aging under approved State plans for the development of comprehensive and coordinated systems of social services, including multipurpose senior centers and nutrition services. Each State agency designates planning and service areas in the State and makes a subgrant or contract under an approved area plan to one area; area agencies in turn make subgrants or contracts to service providers.

Title III-B of the "Older Americans Act Amendments of 1978," Pub. L. No. 95-478, 92 Stat. 1517 (1978): Monies to provide assistance to State and area agencies to support older persons via area planning and provision of social services, including multipurpose senior centers.

Title III-C of the "Older Americans Act Amendments of 1978," Pub. L. No. 95-478, 92 Stat. 1517 (1978): Monies to provide older Americans with low-cost nutritious meals, appropriate nutrition education, and other nutrition services. Meals may be served in a congregate setting or delivered to the home.

Title IV of the "Older Americans Act Amendments of 1978," Pub. L. No. 95-478, 92 Stat. 1517 (1978): Monies to improve the quality of services and to help meet critical shortages of adequately trained personnel for programs in the field of aging.

Title V of the "Older Americans Act Amendments of 1978," Pub. L. No. 95-478, 92 Stat. 1517 (1978): Older Americans community service employment program to foster and promote useful part-time opportunities in community

service activities for unemployed low-income persons 55 years or older who have poor employment prospects. The Department of Labor administers this title of the act.

Title VI of the "Older Americans Act Amendments of 1978," Pub. L. No. 95-478, 92 Stat. 1517 (1978): Promotes the delivery of social services, including nutritional services, for Indians that are comparable to services provided under Title III.

Transportation Services: Transportation services to facilitate access to social services or nutrition services, or both, or to provide needed assistance to elderly persons who have difficulty going places alone.

Vocational Guidance and Counseling Services: Services that provide pre-retirement and second career counseling for older individuals.

Volunteers: This category may include persons doing clerical duties or using special skills in teaching arts and crafts, e.g., pottery making, knitting, and dancing. It does not include persons functioning solely in the capacity of advisory council members.

Volunteer Services: Activities that provide opportunities for older persons to volunteer in the community. Activities may include recruitment, placement, supervision, training, and recognition of volunteers.

Appendix B

City Summaries*

Cleveland, Ohio

Minorities in Cleveland were generally underrepresented in all phases of Title III programs for older Americans administered by the Western Reserve Area Agency on Aging. An examination of the membership of the Western Reserve Area Agency on Aging's advisory council revealed that of the 43 members, 9 were black. No American Indians, Asian Americans, or Hispanics had been selected to serve on the area agency's advisory council.

Blacks were the only minority persons employed by the Western Reserve Area Agency on Aging. American Indians, Asian Americans, and Hispanics did not hold any Western Reserve Area Agency on Aging jobs. Black representation on Western Reserve Area Agency on Aging staff was a direct result of a deliberate effort by the Western Reserve Area Agency on Aging to increase minority representation. Despite inclusion of Hispanics as a target group in its affirmative action plan, the Western Reserve Area Agency on Aging had thus far failed to hire any Hispanic employees.

Black organizations were the only minority agencies receiving funds from the Western Reserve Area Agency on Aging.

* The city summaries are taken from U.S. Commission on Civil Rights, *Minority Elderly Services—New Programs, Old Problems, Part I*

Three black organizations received 10 percent of the Title III-B (social services) funds awarded in Cleveland and four black organizations received 11 percent of the Title III-C (nutrition) funds awarded. Minority agencies cited lack of outreach and technical assistance as major reasons for minimal minority representation among Title III-funded organizations. According to many minority representatives, without more intensive efforts by the Western Reserve Area Agency on Aging in outreach and technical assistance, minority organizations were likely to continue to lag far behind other organizations in obtaining contracts. Other factors that appeared to limit the number of minority organizations were Federal regulations requiring matching funds and an Ohio regulation that public funds can be disbursed only on a reimbursement basis.

Although most Title III-funded organizations employed relatively few minorities on their staffs, the Western Reserve Area Agency on Aging had not required Title III-funded organizations to increase minority employment. Generally, organizations without minority employees had not been censured. For example, the Western Reserve Area Agency on Aging (June 1982). For more detail, the reader should see the above report.

was increasing the funding of the Visiting Nurses Association although this Title III-funded organization had no minority nurses in its Title III-funded program.

In almost every Title III service, Cleveland's minority elderly were being underserved in relation to their representation in the eligible population in Cleveland and even more so in relation to their relative social and economic needs. Black senior citizens participated in all Western Reserve Area Agency on Aging-funded social services, but they were underrepresented in 10 of the 17 services. Asian American elderly participated in 8 of the 17 services, but constituted less than 1 percent in 7 of the 8. American Indian elderly participated in 4 services at less than 1 percent. Hispanics participated in 13 services, always in very low percentages.

Minority older persons also were not being fully served by the Western Reserve Area Agency on Aging's nutrition program. Asian American and American Indian older persons were participating in nutrition programs at a rate of less than 1 percent.

Minorities were not participating fully in multipurpose and focal point centers in Cleveland. The Western Reserve Area Agency on Aging began designating focal points in 1979. Three were located outside Cleveland and three focal points were located in Cleveland. Only one of the three centers in Cleveland served a predominantly minority clientele. The one center that served the Hispanic aged lacked the full resources of a focal center. Another focal point center, Deaconess Krafft Complex (Brighton), was located near a Hispanic community. Hispanic

elderly were less likely to use its services because established transportation boundary lines did not include their area. The factors that appeared to affect minority participation in Cleveland included whether the service provider was a minority organization, the extent of minority employment by service providers, and the service location.

Bridgeport, Connecticut

Bridgeport is the largest city in Connecticut and contains a sizable population of minorities (21.0 percent black and 18.7 percent Hispanic). The city also has the highest proportion of older minorities (47 percent of all black and 42 percent of all Hispanic elderly) in the southwestern Connecticut planning and service area administered by the Southwestern Connecticut Agency on Aging. The agency, in addition to Bridgeport, serves 13 other municipalities located in the planning and service area.

A recent increase in hiring and promotion of minorities had resulted in close to 50 percent minority representation on the Southwestern Connecticut Agency on Aging staff. However, no minorities held decisionmaking positions.

Two of the nine Title III-B funded organizations serving Bridgeport were minority organizations. The Federation of Neighborhood Councils and the Spanish American Development Agency received 37.5 percent of Title III-B funds awarded in Bridgeport during 1980. In Bridgeport, minorities held management-level positions only in Title III programs operated by the Federation of Neighborhood Councils and Spanish American Development Agency.

In 1980 minority organizations and the Southwestern Connecticut Agency on

Aging jointly sponsored a workshop to inform potential minority organizations about the Southwestern Connecticut Agency on Aging and its resources. It was the first such effort to attract more minority organizations that may have been interested in providing services with Title III funding. One minority firm was awarded a transportation contract.

Minorities were served by all 13 Title III-funded organizations operating in Bridgeport. Programs set up or operated by minorities tended to have higher minority participation rates. Service rates to minorities were much lower among the nonminority organizations receiving Title III-funds. The single exception was the Interfaith Friendly Visiting program. Service delivery to minorities was increased from approximately 16.0 percent to 21.2 percent in 1980.

Compliance with Federal nondiscrimination requirements in service delivery was accomplished mainly through onsite reviews conducted twice yearly. Ongoing monitoring for compliance took place with the review of monthly and quarterly reports submitted by Title III-funded organizations.

Tucson, Arizona

The city of Tucson, Arizona, is diverse in its racial and ethnic composition. The largest minority group in Tucson is Hispanic, representing 24.9 percent of the city's total population. Tucson also had a sizable minority elderly population who, relative to white Anglo elderly, disproportionately were in poverty. The area agency with jurisdiction over Tucson is the Pima Council on Aging (PCOA). There were black, Hispanic, and American Indian representatives on the Pima

Council on Aging's advisory council. There were no Asian American representatives on the council.

Minorities were not represented on its Title III-funded staff. The Pima Council on Aging is required to have an affirmative action plan and submit the plan to the State unit on aging. According to Pima Council on Aging representatives, the council had not been able to implement the plan, since there was so little staff turnover at the agency.

In 1980, PCOA funded four organizations under Title III to provide legal aid, home health aide and chore maintenance, housing renovation, and nutrition services. None of the organizations was minority. The Pima Council on Aging anticipated no new Title III-funded organizations, since all additional funds the Pima Council on Aging received would go into maintaining or expanding the existing organizations' funding.

For the most part, minorities were not employed in decisionmaking positions within Title III-funded programs. One exception to this was the city of Tucson's housing renovation program whose director was Hispanic. Although all Title III-funded organizations were required to have affirmative action plans, Pima Council on Aging staff said that the agency did not have enough staff to monitor Title III-funded organizations' efforts.

Three Title III-B programs served Tucson's elderly: in-home services, legal aid services, and housing renovation services. Only three American Indians and no Asian Americans were participating in the in-home health aide and chore maintenance services. The legal aid program did not serve American Indians or

Asian Americans. Minority elderly received a greater share of services under the housing renovation program, but American Indians and Asian Americans were not served by it. Senior Now Generation provided all of the Title III-C nutrition services in Tucson. With the exception of kosher food, no culturally appropriate meals were provided.

Tulsa, Oklahoma

Tulsa, with a population of 360,919, is the second largest city in Oklahoma. Minorities accounted for 16 percent of this population, nearly 4 percent of whom were American Indians. Census data for 1970 showed that approximately 43,230 persons in Tulsa were 60 years and older. White elderly were 88 percent of this total, and minorities accounted for the remaining 12 percent.

The Tulsa Area Agency on Aging is responsible for planning and administering Title III programs for the elderly in Tulsa. The advisory body to the Tulsa Area Agency on Aging is the Tulsa Area Council on Aging, which includes the mayor and 46 other members who are appointed by the mayor for 1-year terms. Thirty-six members were white and 11 were minority—7 of whom were black and 4 of whom were American Indian.

In 1980 the Tulsa Area Agency on Aging's staff was 50 percent minority. Two of three professional staff positions were held by minorities—one American Indian and one Asian American. As early as 1974 when the agency was established, one of two professional planner positions was held by an American Indian. The agency did not have any Hispanic or American Indian employees or any workers who were bilingual.

In 1979 (the last full funding year before the Tulsa Area Agency on Aging changed from a calendar fiscal year to the Federal fiscal year), 34.5 percent or \$61,723 of the funds disbursed in Tulsa were received by two minority organizations: Native American Coalition and Tulsa Human Service Agency.

Title III-funded organizations in Tulsa employed from one to five program workers, few of whom were minorities. Legal Aid for Senior Citizens, Tulsa City County Health Department, Tulsa City County Library (information and referral), and Jobs for Older Tulsans had no minorities in their Title III-funded programs. The Native American Coalition transportation program reported the largest number of minority staff. Hispanics were not employees of and did not receive funds to operate any of Tulsa's III-B programs.

The Tulsa Area Agency on Aging required affirmative action plans for employment and set rates for minority participation under the terms of its awards. The Tulsa Area Agency on Aging also required that Title III-funded organizations sign a list of assurances that included nondiscrimination in service delivery and employment. Onsite compliance reviews were conducted quarterly to assess performances in these areas. Technical assistance was provided to organizations experiencing difficulty meeting their goals for minority employment and participation.

The Tulsa Area Agency on Aging provided access, in-home, legal, health support, and employment services to elderly Tulsans. Participation statistics for these programs indicated that large numbers of elderly minority senior citi-

zens in Tulsa remained untouched by Tulsa Area Agency on Aging services. In fact, participation data showed that minorities were generally underrepresented in the Title III-funded programs. American Indian elderly, in particular, received few Title III services. In general, Tulsa's minority elderly population was at least twice as likely to be in poverty as the nonminority elderly population. Although the nutrition program had only recently come under the Tulsa Area Agency on Aging, participation statistics showed that minority elderly were not benefiting significantly from this program. The fact that during October through December 1980 less than 10.0 percent of the participants in the nutrition program were minorities indicated minority underrepresentation in the program.

San Francisco, California

In 1980 San Francisco's population was estimated at 678,974. Minorities represented more than 42 percent of the population. There also was a minority elderly population of 31,596 people (22.3 percent of elderly) in San Francisco in 1970. Minority elderly in San Francisco were more likely to be in poverty than nonminority elderly. Available statistics from the Bureau of the Census indicated that elderly Asian Americans and blacks were nearly twice as likely as elderly whites to be in poverty.

The San Francisco Commission on Aging is the area agency on aging responsible for administering programs that take into consideration the needs of San Francisco's elderly population, especially those most socially and economically in need. New commissioners, advisory council members, and an executive

director of the agency were appointed in early 1981. Minorities constituted over 50 percent of the commissioners and advisory council members. The new executive director of the commission is black. The rest of the San Francisco Commission on Aging work force was made up predominantly of white professionals and minority support staff or minority part-time community workers. The San Francisco Commission on Aging adopted an affirmative action plan in early 1981. The San Francisco Commission on Aging's affirmative action goals include hiring Hispanics, since they were underrepresented at the agency. However, none of the three persons hired at the agency in the past 6 months was Hispanic.

In fiscal year 1980-81 the San Francisco Commission on Aging distributed \$2,115,612 in Title III funds. Two minority organizations received 16.5 percent of the Title III-B (social services) funds: Self-Help for the Elderly, a Chinese American organization, and Mission Neighborhood Centers, an Hispanic organization. Five nonminority organizations received 83.5 percent of the Title III-B funds. American Indian, black, Japanese American, and Filipino American organizations did not receive any funds under Title III-B for fiscal year 1980-81. In addition to the seven awards for Title III-B, the San Francisco Commission on Aging funded eight nutrition awards under Title III-C, totaling \$1,524,161. One black organization, one Chinese American, one Japanese American, one American Indian, and four nonminority organizations received Title III-C funds in fiscal year 1980-81. The four nonminority organizations received \$1,035,752

or 68.0 percent of the Title III-C funds awarded. Hispanic and Filipino American organizations did not receive any Title III-C funds in fiscal year 1980-81.

In fiscal year 1981-82, all organizations were to be funded at 91 percent of their previous year's funding, with the remaining money to be used to bring new organizations into the funding stream and to improve existing services in some areas. Organizations noted, however, that the money made available for new awards would not be enough to fund new organizations adequately. The additional funds for fiscal year 1981-82 were awarded to seven minority and four nonminority organizations. Most of the awards were for less than \$15,000.

Minority employees of the Title III-funded organizations generally did not hold decisionmaking positions except when they were employed by minority organizations. No affirmative action plans were required of Title III-B organizations until 1981. Some nonminority organizations did not have bilingual staff or literature in languages other than English.

The participation of minority elderly in Title III programs varied greatly. Looking at each of the services individually, the data showed that minorities were much more likely to benefit from certain services from others, and there appeared to be a direct relationship between minority participation and whether the firm providing the service was minority. Title III organizations indicated that they were serving up to capacity now and did not encourage further participation because of budget constraints. The San Francisco Commission on Aging has not monitored and

evaluated programs regarding minority participation. It did not encourage organizations to do more outreach so that minorities could participate in the available programs.

Honolulu, Hawaii

Asian and Pacific Island Americans represent nearly 73 percent of the residents of Honolulu. Japanese and Hawaiians are the two largest Asian groups. More than 72,000 persons in Honolulu were 60 years of age or older, and almost 73 percent of them were Asian and Pacific Island Americans. Statistics also showed that the elderly population of Honolulu was less well-off economically than the general population and that Filipino elderly, in particular, were more likely to be in poverty. Although Asian and Pacific Island elderly experience the same age-related problems as other older persons, their problems were complicated by cultural and linguistic factors. The special interests and needs of Honolulu's elderly, especially those most socially and economically disadvantaged, were to be addressed by the federally funded Honolulu Area Agency on Aging.

The Honolulu Area Agency on Aging operates with an advisory council—the Honolulu Committee on Aging—which had 18 members. Japanese accounted for 39 percent of the committee's membership. Chinese held 22 percent of the committee positions while Hawaiians represented 11 percent of the committee's membership. The racial and ethnic composition of the Honolulu Area Agency on Aging staff was similar to that of the committee on aging. Four of the six professional staff positions were filled by Japanese, while two positions were held by Chinese. Hawaiians were represented

in clerical and paraprofessional positions; Filipino representation was limited to aide positions.

The Honolulu Area Agency on Aging placed little emphasis on language qualifications for staff although a significant proportion of the elderly population served by the Honolulu Area Agency on Aging did not speak English. As a result, many community representatives voiced concern that the Honolulu Area Agency on Aging did not effectively serve certain elderly ethnic groups because of language communication difficulties. According to representatives of the Susannah Wesley Community Center, the agency was especially unable to serve new immigrant groups such as Koreans, Samoans, and Indochinese.

Since there was a very low turnover rate at the Honolulu Area Agency on Aging, there were few new hires and few promotions. In addition, although the Honolulu Area Agency on Aging is part of the Honolulu Office of Human Resources, which does have an affirmative action plan, there was no separate affirmative action plan in effect for the Honolulu Area Agency on Aging.

In fiscal year 1980-81, six Title III awards were made by the Honolulu Area Agency on Aging. None of the six Title III-funded organizations was minority. Three of the agencies were nonprofit public service agencies administered by boards of directors, each with a majority-white membership. Only the Title III-C (nutrition) funded organizations awarded funds to other organizations for direct service provision. Two of the five meal providers with nutrition subawards were minority organizations. Staff employed by the Title III-funded organizations was

composed predominantly of Asian and Pacific Island Americans. Persons of Japanese and Chinese backgrounds, however, were more likely to be employed by the Title III-funded organizations in administrative level positions than Hawaiians or Filipinos. In contrast, Filipinos and Hawaiians were more likely to be represented in service worker positions than any of the other groups.

Although the Honolulu Area Agency on Aging did not stress the need to hire bilingual staff and believed that there were few communication difficulties with minority older persons since everyone spoke "pidgin," all except one of the Title III-funded organizations did take bilingual capabilities into consideration when hiring. One Title III-funded organization included bilingualism as an overall job requirement. Title III-funded organizations also stated that the Honolulu Area Agency on Aging did not impress upon them the need to take into consideration the diverse cultural backgrounds of the elderly people that they served.

The Honolulu Area Agency on Aging required Title III-funded organizations to submit monthly reports as well as affirmative action plans. Most Title III-funded organizations indicated, however, that the Honolulu Area Agency on Aging did not enforce the requirement that Title III-funded organizations submit the race or ethnicity of program participants. The recently appointed county executive on aging stated, however, that the AAA will be monitoring this requirement more closely in the future.

The available statistics on program participants showed that, in general, Hawaiian elderly were underserved when compared with their representa-

tion within the elderly population. In particular, the chairperson for the office of Hawaiian affairs voiced concern about the low number of Hawaiians taking part in the nutrition program. Representatives from Alu Like and other Hawaiian interest groups also pointed to the limited number of Hawaiian elderly participating not only in the nutrition program, but also in all Title III services.

Title III-funded organizations, as well as representatives of other organizations that serve elderly persons, emphasized the absence of culturally responsive services, particularly in the nutrition program. Nearly 90 percent of the participants in the program were Asian and Pacific Island Americans whose meal preferences and problems with the current meal service delivery had been

documented. Although four of the five meal service providers took into consideration the ethnic diversity of the participants in the nutrition program when preparing menus, one provider did not. That one provider, however, prepared more than 87 percent of all meals served in the program. Although the Honolulu Area Agency on Aging was aware of this, the agency had made no plans to recommend that the Title III-funded organization change menu selections.

Title III service programs generally did not use outreach efforts that could increase participation of the elderly. The lack of information about program services, particularly in languages other than English, hindered the recruitment of non-English-speaking seniors for programs.

Appendix C Methodology

The methodology used in Phase II¹ of the study of equal opportunity for racial and ethnic minorities in programs funded by the Older Americans Act is designed to address three major issues: (1) the scope of minority employment in these programs, (2) the degree to which Federal grants and contracts are awarded to minority firms and organizations under these programs, and (3) the extent of participation by minorities in the planning and use of services provided by these federally assisted programs for older persons. Since there are few national data on minority participation in federally assisted programs for older persons, information for this phase of the study was obtained from mailout questionnaires to State units on aging and area agencies on aging and onsite interviews at Administration on Aging (AoA) headquarters, the agency that adminis-

¹ The U.S. Commission on Civil Rights designed a two-phase study. Phase I involved case study analyses of selected cities across the Nation. Face-to-face interviews were conducted with local area agency on aging administrators, social service providers, representatives of community organizations, and area agency on aging advisory council members in each community. The results of the case study analyses (Phase I) were published separately. See U.S., Commission on Civil Rights, *Minority Elderly Services—New Programs, Old Problems, Part I* (June 1982).

² In both phases, the Commission's investigations focused on programs funded by Title III of

the Older Americans Act programs. Separate questionnaires were developed for the Federal, State, and local programs. All questionnaires solicited information on program staffing patterns and affirmative action activities. Administrators also were questioned on procedures for identification of contractors and criteria for their selection. All questionnaires also included questions on the extent of minority participation in program planning, management, administration and evaluation, types of records and data kept on minority participation, and methods of targeting and ensuring provision of services to minorities.³

State and Area Agency Mail Questionnaires

Questionnaires were developed to be sent to all State units on aging and area agencies on aging.³ Local consultants

the Older Americans Act. Phase II also covers the Administration on Aging's award of Title IV monies. See chapter 1 for further explanation of these programs.

³ Each State and the District of Columbia has a State unit on aging. There also are State units on aging in Guam, Mariana Islands, Northern Mariana Islands, Puerto Rico, American Samoa, and Virgin Islands. State questionnaires also were sent to these U.S. territories. States are authorized to establish planning and service areas (PSAs) within their respective boundaries and to designate an area agency on aging for each PSA. In March 1981 there were more than 600 area

from aging organizations reviewed initial drafts of the questionnaires and their comments were used in developing succeeding drafts. These drafts were later sent to several specialists in the field of aging to obtain a more comprehensive assessment of the instruments from people who actually work with the programs. Revised drafts were then pretested in State and selected area offices on aging in Maryland, Virginia, and New Mexico. Following pretesting and subsequent revisions, copies of drafts of State and area agency questionnaires and supporting materials were sent to the Office of Management and Budget (OMB) for clearance. Study staff members met with officials of AoA and OMB and decided on acceptable modifications of both questionnaires in an effort to reduce respondent burden. Following completion of suggested modifications, both State and area agency questionnaires received OMB approval.⁴

Cognizant of the importance of a high rate of response for the validity of the study's findings,⁵ a letter was sent from the U.S. Commission on Civil Rights' Chairman, Arthur S. Flemming, to the AoA Commissioner on Aging, Robert

agencies on aging.

⁴ Copies of the final versions of the State and area agency questionnaires are included at the end of this appendix.

⁵ Mailed surveys have traditionally experienced very low response rates. Because of this, response rates well below 50 percent are often considered to be acceptable by professional researchers. Don A. Dillman, *Mail and Telephone Surveys* (New York: John Wiley and Sons, 1978).

⁶ Arthur S. Flemming has since resigned from the U.S. Commission on Civil Rights. Robert Benedict has since been replaced by Lennie-Marie Tolliver as Commissioner on Aging.

⁷ Each respondent was guaranteed anonymity and confidentiality. In the interest of obtaining a

Benedict,⁶ requesting official AoA support for the survey. Letters signed by Commissioner Benedict were sent to State and area agencies in advance of the questionnaires. These letters alerted program managers to the study and encouraged their cooperation.⁷ State and area questionnaires were printed in booklet form and subsequently mailed to all potential respondents.⁸ Each mailed questionnaire contained a self-addressed stamped return envelope.

Extensive followup activities were undertaken in an effort to increase response rates. A week after the initial mailing, telephone calls were made to all potential respondents to check their receipt of the questionnaires. If a potential respondent had not received a questionnaire, another was immediately put into the mail. An initial followup postcard was mailed to all agencies 2 weeks after the initial mailing, thanking those that had responded and requesting those that had not done so to return their completed questionnaire. After 4 weeks, potential respondents who still had not responded were sent a followup letter requesting their cooperation and were mailed new questionnaires. Staff ob-

truly representative sample of responses, questionnaires were sent to all potential respondents. No selection criteria were developed and all members of the population had an equal chance of being included in the final results. Since in essence a census, as opposed to a sample was used, the response rate is a good indicator of representativeness of the results. It should be noted, however, that no effort was made to evaluate unknown bias that may reflect differences in respondents and nonrespondents.

⁸ A set of mailing labels for all State and area agencies was obtained from AoA and cross-checked with both a White House conference listing and a congressional listing of Older Americans Act program managers and offices.

tained a 95 percent response rate to the State questionnaire and a 69 percent response rate to the area questionnaire.⁹

When questionnaires were returned, they were checked for accuracy and completeness. Checks for internal consistency in responses also were done, and further checks were made for appropriateness of responses. Failure of both State and area agency respondents to complete all required information on the questionnaires necessitated that time be devoted to calling back for missing information.¹⁰

Incomplete and missing responses were a much greater problem on the area agency questionnaires where it also was often necessary to call back to reconcile major inconsistencies.¹¹

Following initial hand checking and error resolution by the U.S. Commission on Civil Rights, questionnaires were sent to a contractor for preliminary data processing. The contractor was responsible for ensuring that questionnaire responses were correctly keypunched and that responses were placed on data tape.¹² An edit program was created and edit runs were performed. Discrepancies

discovered by the edit program were given to Commission staff for resolution. The edit checks uncovered some problems with the data, which staff analyzed and corrected.¹³ Although in most instances staff were able to identify and correct the problems without calling back a State agency, several area agencies had to be called back to clarify responses to questions.¹⁴ Corrections of data discrepancies discovered through the computer edit were returned to the contractor. The contractor corrected the data in question and ran these through the edit procedure again. This reduced the number of discrepancies substantially.

SPSS data files for the State and area questionnaires were then created. Corrections of State SPSS files were done, and population data were added to the State unit on aging computer file, and again the overall data were checked for internal consistency.¹⁵ Because information on the racial and ethnic composition of the surveyed population often was incomplete on the area questionnaires,¹⁶ it was necessary to obtain this informa-

⁹ States that participated in the field test (Virginia, Maryland, and New Mexico) were told that they did not have to return a questionnaire. Virginia, however, was the only State that did not respond. Of the questionnaires mailed to 619 area agencies, 426 were returned.

¹⁰ This was in addition to time for the routine checks for accuracy and completeness.

¹¹ For example, often the number of minority contracts awarded exceeded the total number of contracts awarded.

¹² The mailout questionnaires contained mostly precoded, closed-ended responses with only a few open-ended responses. (See copies of questionnaires at end of this appendix.) Although this type of questionnaire format lends itself to preparation so that only minimal coding for computer use is necessary, it limits the researchers' ability to probe and clarify responses.

¹³ Of the 426 questionnaires returned, 42 were discarded at this stage because of numerous problems with the information in them.

¹⁴ For example, call backs were done when responses suggested an agency had no employees or no nonminority employees or no contract awards.

¹⁵ State population figures for 1970 and 1980 were assembled from census sources and mathematically adjusted so that Hispanics were not double counted. The population figures were entered into coding sheets and keypunched through the Commission's computer facilities. Information necessary for merging the population figures with the existing State SPSS files was provided to the contractor. Population figures were merged with the existing State SPSS file.

tion for addition to the area agency file. Rather than burden respondents further, however, population figures were assembled by Commission staff from census sources for as many questionnaires as was feasible. Population figures were obtained and added to area questionnaires with incomplete responses. Given the number of questionnaires returned without complete population data and the differences in size of population served by area agencies on aging, it was decided to control for population size. By controlling for population size, Commission staff were able to generate a file for all area agencies on aging with more than 200,000 population that responded to the survey. Thus, the number of area agencies on aging in the Commission's survey was limited to 206.¹⁷

Recoded variables were defined and saved on master SPSS files with the original variables. Analyses consisted of frequency distributions and tabulations,¹⁸ comparison of expected patterns

¹⁶ For example, respondents provided information on the white population, but provided only some or no data for the other racial and ethnic populations.

¹⁷ This number represents 33 percent of all area agencies on aging that were sent questionnaires. The emphasis placed on area agencies with a population over 200,000, although reflective of urban areas where minority older persons tend to dwell, may result in findings that are less representative of areas with smaller populations and where minorities are only a very small percentage of the population.

¹⁸ Frequencies and crosstabs were run on all original and recoded variables and checked for reasonableness and missing values. Upon examining the employment results, staff believed that the information did not appear to provide an accurate accounting of minority employment under the Older Americans Act. In order to verify the employment data, staff again called back respondents to recheck the employment questions.

of minority representation and actual representation, and multivariate analyses such as contingency table and correlation analyses of minority participation representation and program characteristics.¹⁹ These comparisons were used to help determine whether minorities are a smaller, larger, or the same percentage of program participants, employees, and grant recipients as the percentage of minorities in the relevant population.²⁰

Questions on minority participation in specific services often were left unanswered. In most cases, the actual provision of services is contracted out by the area agency on aging to private nonprofit entities that often may not provide adequate participation figures to the area agency.²¹ Thus, information on participation for these contractors and their service provision patterns may not be obtainable by the area agencies on aging. Because of the widespread failure to respond to these questions,²² statistical analysis was not attempted. Because

¹⁹ Cross tabulations and correlation analyses were used to determine the extent to which program design and implementation strategies facilitate or erect barriers to the participation of minority elderly. For example, these methods of analyses were used to explore the relationship between minority staffing patterns, participation of minorities on advisory boards, and the award of contracts to minorities.

²⁰ Since only 1970 data were available for all groups in the study, these were used. These figures, however, tend to understate the actual number of minority persons in the population. It should be noted also that due to the social and economic need of minority older persons, a comparison of population statistics alone does not provide a clear picture of the extent to which minority needs are being met by service programs.

²¹ See findings from Phase I of the study on the general unavailability of statistics on minority participation.

of problems with data received on participation, comparisons of expected minority participation could not be used to help document the extent of underutilization of services by minority older persons.

AoA Interviews

An interview schedule was developed and reviewed similarly to the mailed questionnaires. AoA staff were contacted to request interview dates and a formal request for staff interviews was sent to the Commissioner on Aging. Interviews were scheduled with AoA staff. The U.S. Commission on Civil Rights found that much of the required regional level information was not available at headquarters. Document packets were prepared for mailing to the 10 AoA regional offices to obtain the necessary information.

Personal interviews were conducted at the Administration on Aging during a 2-week period, February 1-12, 1982. These interviews were conducted with Administration on Aging staff who provided information on employment, grants and contracts, and the monitoring and evaluation of service delivery under Title III (grants for State and community programs on aging) and Title IV (grants for training, research, and discretionary projects and programs) of the Older Americans Act. Interviews were held with AoA program administrators from the following offices: Office of the Commissioner; Office of Management and Policy Control; Office of Research, Demonstration, and Evaluation; Office of Program Operations; and Office of Education and Training.

²² See questions 23, 25, and 27 on the area questionnaires. Because of the large number of nonresponses on returned questionnaires, it was

In particular, the Commission staff interviews at AoA covered program staffing and levels, affirmative action activities, funding sources and budgets, program evaluation efforts, and monitoring of compliance with civil rights laws. The interviews sought additional information on the following issues: program priorities and the extent to which the concerns of minority older persons enter into the determination of these priorities, attempts by administrators to identify differential needs of the minority aged, sensitivity of program administrators to the need for minority representation and participation in aging programs, attempts to increase participation of minorities in all phases of the aging program, knowledge and evaluation of the factors determining minority participation, effectiveness of alternative delivery strategies for minority participation, role and selection of advisory committees, and efforts to coordinate programs with other agencies to maximize service delivery to the minority aged. A separate mailout survey solicited information on the employment and staffing patterns of the 10 AoA regional offices. Staff transcribed interview notes for use in the report. The interview notes were incorporated with other data to complete the report.

Although we have recommended that previous language in the OAA that required the inclusion of minorities in OAA programs be restored, we have no firm data that documents a significant drop in minority participation as a result of the 1978 amendments. We are unable

not possible to provide a direct or complete link between minority service participation and other variables.

to provide documentation for this recommendation because OMB removed questions that asked for historical information. We based our recommendation on oral statements by program administrators and service providers in the six

cities visited which suggested that they no longer pay as much attention to minority participation because of the removal of emphasis in the regulations and the new emphasis on those in social and economic need.

Minority Participation in Federally Assisted Programs
For Older Persons
STATE UNITS ON AGING SURVEY

Prepared by
U.S. COMMISSION ON CIVIL RIGHTS
1121 VERMONT AVENUE, N.W.
WASHINGTON, D.C. 20425

QUESTIONNAIRE # _____

The U.S. Commission on Civil Rights is conducting this survey as a part of a study intended to examine the participation of minorities in federally assisted programs for older persons. The study and questionnaire concern the employment, the award of grants/contracts and the participation of minorities as recipients of services in Older Americans Act programs administered by the Administration on Aging (AoA). The questionnaire should be completed by a person or those persons most familiar with each of these three subject areas. Your answers along with those of the other State agencies will form part of our report to the Congress and the President scheduled for release in the fall of 1981.

ALL RESPONSES TO THE SURVEY ARE CONFIDENTIAL. AT NO TIME WILL THE RESPONSES OF AN INDIVIDUAL STATE AGENCY BE IDENTIFIED.

We appreciate your cooperation in this study since your help is essential in supplying Congress and the President with the information they need to help ensure that all older Americans share in the benefits of Older Americans Act programs.

If you have any questions regarding this survey, please telephone Mr. Frank Knorr, Project Director at (202) 254-6648. For your convenience, a glossary of selected terms used in this survey can be found at the beginning of the questionnaire.

TO ENSURE THE CONFIDENTIALITY OF YOUR RESPONSES, THE U.S. COMMISSION ON CIVIL RIGHTS WILL REMOVE THIS PAGE UPON RECEIPT OF THE QUESTIONNAIRE.

1. Name of State Unit on Aging _____

2. Address _____

3. City _____ State _____ Zip Code _____

4. Telephone (Include area code) _____

5. Name(s) of Persons(s) with overall responsibility for completing questionnaire.

_____ POSITION _____

_____ POSITION _____

STATE UNIT ON AGING SURVEY
GLOSSARY

<u>AAA:</u>	Abbreviation for Area Agency on Aging
<u>AFFIRMATIVE ACTION PLANS:</u>	Goals and/or timetables for minority participation.
<u>Goals:</u>	Action objectives targeting specific racial and ethnic minorities for hiring, promotion and training opportunities who have been underutilized because of past discrimination. Goals are different from quotas.
<u>Timetables:</u>	Specific time periods during which activities are initiated to hire, train and promote racial and ethnic minorities targeted for affirmative action.
<u>AoA:</u>	Abbreviation for Administration on Aging
<u>CLERICALS:</u>	Persons who perform general office work. Includes, for example, file clerks, office machine operators, stenographers, and typists.
<u>COMPLIANCE REVIEW:</u>	Method for determining whether required standards are met.
<u>D.K:</u>	Abbreviation for don't know.
<u>EVALUATION:</u>	The formal appraisal and study of the operation of a program.
<u>FULL-TIME:</u>	More than 35 hours of work per week in an agency.
<u>GRANTEE/CONTRACTOR:</u>	Any organization or agency having a State Unit on Aging or Area Agency on Aging contract or grant.
<u>Subgrantee/subcontractor:</u>	Any organization or agency having a grant/contract with a prime grantee/contractor or another subcontractor calling for provision of supplies or services required for the performance of a State Unit on Aging or Area Agency on Aging contract/grant.
<u>MINORITIES:</u>	American Indians/Alaskan Natives, Asian and Pacific Island Americans, Blacks and Hispanics.

<u>American Indian or Alaskan Native:</u>	A person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal affiliation or community recognition.
<u>Asian or Pacific Island American:</u>	A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands, and Samoa.
<u>Black:</u>	A person having origins in any of the black racial groups of Africa.
<u>Hispanic:</u>	A person of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.
<u>MINORITY ORGANIZATION:</u>	An organization whose board of directors or other like policy-making bodies is at least 50 percent minority or whose total staff is composed of at least 50 percent minorities. (as defined above).
<u>MINORITY-OWNED FIRM:</u>	A firm whose sole ownership or at least 50.1 percent of whose stock is owned by minorities (as defined above). In a partnership, at least 50% of the interest in the partnership must be controlled by a minority individual.
<u>MONITOR:</u>	To watch, observe or check the operations of a program in an informal or formal way.
<u>MULTIPURPOSE SENIOR CENTER:</u>	A community or neighborhood facility for the organization and provision of a broad spectrum of services including health, social, nutritional and educational services and a facility for recreational group activity for older persons.
<u>NEEDS ASSESSMENT:</u>	Reasonable and objective method for determining the needs of all eligible residents of a geographic area.
<u>OAA:</u>	Abbreviation for Older Americans Act as amended in 1978.
<u>Title III:</u>	Grants for State and Community Programs on Aging.

<u>Title IV-A:</u>	Training Grants.
<u>Title VI:</u>	Grants for Indian Tribes.
<u>OLDER PERSONS:</u>	Those individuals who are 60 years of age or older.
<u>PARAPROFESSIONALS:</u>	Occupations requiring either junior college training or on-the-job training. Term most often applies to job categories in the human services fields, e.g., social services and mental health services. Includes, for example, outreach workers, homemaker aides, and nutrition aides.
<u>PART-TIME:</u>	Less than 35 hours of work per week in an agency.
<u>PROFESSIONAL:</u>	Occupations requiring either college graduation or experience of such a kind and amount as to provide a comparable background. Includes persons who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of a State Unit on Aging's operations. Includes for example, program directors, planners, nutritionists, nurses, and social workers.
<u>PSA:</u>	Abbreviation for Planning and Service Area.
<u>SENIOR ADVOCATES:</u>	Persons trained to perform activities to initiate, modify or eliminate public and private policies that have significant impact on the lives of older persons.
<u>SUA:</u>	Abbreviation for State Unit on Aging.
<u>VOLUNTEER:</u>	Person who works two or more hours per week for the agency without pay. This category may include clerical duties or use of special skills in teaching arts and crafts, e.g., pottery making, knitting, and dancing. It does not include persons functioning solely in the capacity of Advisory Council members.

1. Which one of the following best describes the organizational structure of the State Unit on Aging? (CIRCLE APPROPRIATE NUMBER AND ATTACH ORGANIZATION CHART.)

1 = AN AGENCY WHOSE SINGLE PURPOSE IS TO ADMINISTER PROGRAMS FOR OLDER PERSONS

2 = A MULTIPURPOSE AGENCY THAT ADMINISTERS HUMAN SERVICES PROGRAMS IN THE STATE

3 = A COMPONENT UNIT OF A STATE MULTIPURPOSE AGENCY

4 = OTHER (PLEASE SPECIFY) _____

9 = DON'T KNOW

2. How many Planning and Service Areas (PSAs) are there in your State?

(ENTER NUMBER.) _____

3. Are there Planning and Service Areas in your State that cover American Indian jurisdictional areas? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

4. Are there any Area Agencies on Aging in your State administered by an American Indian Tribal Organization? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

THE FOLLOWING ARE QUESTIONS CONCERNING THE EMPLOYMENT AND STAFFING PATTERNS OF THE STATE UNIT ON AGING (SUA)*.

5. Complete the following table for permanent salaried employees who work for the State Unit on Aging full-time as of January 1, 1981, (i.e., 35 or more hours per week). (ENTER THE NUMBER OF PERSONS HOLDING POSITIONS LISTED BELOW FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.) NOTE THAT HORIZONTAL FIGURES FOR EACH JOB CATEGORY SHOULD SUM TO THE TOTAL COLUMN. PLEASE ATTACH COPY OF STAFFING PATTERNS REPORT.

	BLACKS(NOT OF HISPANIC ORIGIN)	HISPANICS	ASIAN AND PACIFIC ISLAND AMERICANS	AMERICAN INDIAN/ ALASKAN NATIVES	WHITES (NOT OF HISPANIC ORIGIN)	TOTAL
AGENCY DIRECTOR	-- --	-- --	-- --	-- --	-- --	-- --
PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
PARA- PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
CLERICALS	-- --	-- --	-- --	-- --	-- --	-- --
OTHER (PLEASE SPECIFY)	-- --	-- --	-- --	-- --	-- --	-- --
Total	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --

6. Complete the following table for permanent salaried employees who work for the State Unit on Aging part-time as of January 1, 1981, (i.e., less than 35 hours per week). ENTER THE NUMBER OF PERSONS HOLDING POSITIONS LISTED BELOW FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.) NOTE THAT HORIZONTAL FIGURES FOR EACH JOB CATEGORY SHOULD SUM TO THE TOTAL COLUMN. PLEASE ATTACH COPY OF STAFFING PATTERNS REPORT.

	BLACKS(NOT OF HISPANIC ORIGIN)	HISPANICS	ASIAN AND PACIFIC ISLAND AMERICANS	AMERICAN INDIAN/ ALASKAN NATIVES	WHITES (NOT OF HISPANIC ORIGIN)	TOTAL
AGENCY DIRECTOR	-- --	-- --	-- --	-- --	-- --	-- --
PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
PARA- PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
CLERICALS	-- --	-- --	-- --	-- --	-- --	-- --
OTHER (PLEASE SPECIFY)	-- --	-- --	-- --	-- --	-- --	-- --
Total	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --

*YOU MAY WISH TO REVIEW POSITION DEFINITIONS IN THE GLOSSARY. THOUGH MANY OF SUA STAFF MAY PERFORM VARIOUS DUTIES, EACH EMPLOYEE SHOULD BE ENTERED IN THE POSITION CATEGORY FOR WHICH HIS OR HER MAJOR RESPONSIBILITIES ARE INCLUDED.

7. Does the State Unit on Aging have an affirmative action plan that is currently in effect? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO... SKIP TO 10

9 = DON'T KNOW

8. Does the State Unit on Aging's (SUA's) affirmative action plan have any of the following requirements? (CIRCLE "1" IF THE SUA'S AFFIRMATIVE ACTION PLAN CONTAINS THE ITEM. CIRCLE "2" IF IT DOES NOT. CIRCLE "9" ONLY FOR THOSE ITEMS ABOUT WHICH YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
GOALS FOR HIRING MINORITIES*	1	2	9
GOALS AND TIMETABLES FOR HIRING MINORITIES	1	2	9
GOALS FOR PROMOTING MINORITIES	1	2	9
GOALS AND TIMETABLES FOR PROMOTING MINORITIES	1	2	9
GOALS FOR TRAINING MINORITIES	1	2	9
GOALS AND TIMETABLES FOR TRAINING MINORITIES	1	2	9
OTHER (PLEASE SPECIFY)	1	2	9

*FOR THE PURPOSES OF THIS QUESTIONNAIRE, THE WORDS MINORITY AND MINORITIES REFER TO BLACKS, HISPANICS, ASIAN AND PACIFIC ISLAND AMERICANS AND AMERICAN INDIANS/ALASKAN NATIVES.

9. Was the State Unit on Aging successful in meeting its affirmative action goals for the hiring and promotion of minority persons in fiscal years 79 and 80? (CIRCLE APPROPRIATE NUMBERS.)

<u>HIRING</u>		<u>PROMOTION</u>	
<u>FISCAL YEAR 79</u>	<u>FISCAL YEAR 80</u>	<u>FISCAL YEAR 79</u>	<u>FISCAL YEAR 80</u>
1 = YES	1 = YES	1 = YES	1 = YES
2 = NO	2 = NO	2 = NO	2 = NO
8 = NOT APPLICABLE, NO GOALS SET	8 = NOT APPLICABLE, NO GOALS SET	8 = NOT APPLICABLE, NO GOALS SET	8 = NOT APPLICABLE, NO GOALS SET
9 = DON'T KNOW	9 = DON'T KNOW	9 = DON'T KNOW	9 = DON'T KNOW

10. Below is a list of problems a State Unit on Aging (SUA) may encounter in recruiting minority staff. How serious do you think each of the following problems are for your SUA? (USING THE CODES IN THE BOX TO THE RIGHT, PLACE THE APPROPRIATE NUMBER BESIDE EACH PROBLEM. PLACE A "9" BESIDE AN ITEM IF YOU DO NOT KNOW WHETHER IT IS A PROBLEM FOR YOUR SUA.)

	CODES
_____ LOW AGENCY PRIORITY	1 = VERY SERIOUS PROBLEM
_____ LITTLE OR NO STAFF TURNOVER	2 = MODERATE PROBLEM
_____ BUDGET RESTRICTIONS ON ACTIVE RECRUITMENT	3 = MINOR PROBLEM
_____ RESTRICTIVE PERSONNEL REGULATIONS (e.g., standardized educational criteria, tests, residence or citizenship requirement for employment)	4 = NO PROBLEM
_____ LACK OF TRAINED MINORITY PERSONNEL	9 = DON'T KNOW
_____ OTHER (PLEASE SPECIFY) _____	

11. Does State Unit on Aging require that Area Agencies on Aging have an affirmative action plan? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO... SKIP TO 13

9 = DON'T KNOW

12. Does the Area Agency on Aging's (AAA's) affirmative action plan required by the State Unit on Aging (SUA) have any of the following requirements? (CIRCLE "1" IF THE SUA REQUIRES THAT AAAS' AFFIRMATIVE ACTION PLANS CONTAIN THE ITEM. CIRCLE "2" IF IT IS NOT REQUIRED. CIRCLE "9" ONLY FOR THOSE ITEMS ABOUT WHICH YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
GOALS FOR HIRING MINORITIES	1	2	9
GOALS AND TIMETABLES FOR HIRING MINORITIES	1	2	9
GOALS FOR PROMOTING MINORITIES	1	2	9
GOALS AND TIMETABLES FOR PROMOTING MINORITIES	1	2	9
GOALS FOR TRAINING MINORITIES	1	2	9
GOALS AND TIMETABLES FOR TRAINING MINORITIES	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

13. Does the State Unit on Aging (SUA) require Area Agencies on Aging to include staffing plans by race and ethnic background in area plans submitted to the SUA? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

THE FOLLOWING ARE QUESTIONS CONCERNING THE CONTRACTING SYSTEM IN YOUR STATE

14. Does the State Unit on Aging (SUA) keep records or have information available on the number and dollar amount of grants/contracts awarded by the Area Agencies on Aging (AAAs) and also subgrants/subcontracts funded by the AAAs through their grantees or contractors? (CIRCLE "1" IF THE SUA KEEPS RECORDS OR HAS THIS INFORMATION AVAILABLE. CIRCLE "2" IF IT DOES NOT. CIRCLE "9" IF YOU DO NOT KNOW IF THE SUA KEEPS THESE RECORDS.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
NUMBER OF GRANTS/CONTRACTS AWARDED BY AAAs	1	2	9
AMOUNT OF GRANTS/CONTRACTS AWARDED BY AAAs	1	2	9
NUMBER OF SUBGRANTS/SUBCONTRACTS AWARDED BY AAA GRANTEES/CONTRACTORS	1	2	9
AMOUNT OF SUBGRANTS/SUBCONTRACTS AWARDED BY AAA GRANTEES/CONTRACTORS	1	2	9
NUMBER OF GRANTS/CONTRACTS AWARDED BY AAAs TO MINORITY FIRMS/ORGANIZATIONS	1	2	9
AMOUNT OF GRANTS/CONTRACTS AWARDED BY AAAs TO MINORITY FIRMS/ORGANIZATIONS	1	2	9
NUMBER OF SUBGRANTS/SUBCONTRACTS AWARDED BY AAA GRANTEES/CONTRACTORS TO MINORITY FIRMS/ORGANIZATIONS	1	2	9
AMOUNT OF SUBGRANTS/SUBCONTRACTS AWARDED BY AAA GRANTEES/CONTRACTORS TO MINORITY FIRMS/ORGANIZATIONS	1	2	9

*FOR THE PURPOSE OF THIS QUESTIONNAIRE, THE TERMS GRANT/CONTRACT REFER TO FUNDS AWARDED BY AN AREA AGENCY ON AGING (AAA), ITSELF; THE TERMS SUBGRANT/SUBCONTRACT REFER TO FUNDS AWARDED BY AN AAA'S GRANTEE OR CONTRACTOR.

15. How did the percentage of total funds awarded to minority-owned firms and minority organizations compare to the percentage of minorities in your State population in fiscal year 1980? (CIRCLE APPROPRIATE NUMBER.)

- 1 = MINORITY FIRMS/ORGANIZATIONS RECEIVED A LARGER PERCENTAGE OF FUNDS AWARDED THAN THE PERCENTAGE OF MINORITIES IN THE STATE.
- 2 = MINORITY FIRMS/ORGANIZATIONS RECEIVED THE SAME PERCENTAGE OF FUNDS AWARDED AS THE PERCENTAGE OF MINORITIES IN THE STATE.
- 3 = MINORITY FIRMS/ORGANIZATIONS RECEIVED A SMALLER PERCENTAGE OF FUNDS AWARDED THAN THE PERCENTAGE OF MINORITIES IN THE STATE.
- 8 = NOT APPLICABLE, NEITHER AAA NOR STATE AWARDS GRANTS OR CONTRACT MONIES
- 9 = DON'T KNOW

16. Does the State Unit on Aging distribute to Area Agencies on Aging throughout the State specific nondiscrimination guidelines for use with grantees/contractors? (CIRCLE APPROPRIATE NUMBER.)

1 = YES... PLEASE ATTACH GUIDELINES.

2 = NO

9 = DON'T KNOW

17. How often are the following done by the State Unit on Aging (SUA) to determine compliance with its nondiscrimination guidelines and regulations by firms/organizations receiving funding through the SUA? (USING THE CODES IN THE BOX TO THE RIGHT, PLACE APPROPRIATE NUMBER BESIDE EACH OF THE LISTED PROCESSES. PLACE A "9" BESIDE A PROCESS IF YOU DO NOT KNOW HOW OFTEN IT IS DONE.)

_____ SUA CONDUCTS ON-SITE REVIEWS OF SELECTED
SELECTED SERVICE FACILITIES

_____ SUA REVIEWS REPORTS SUBMITTED BY AAAs
AND/OR THEIR GRANTEEES/CONTRACTORS

_____ SUA REVIEWS REPORTS OF EVALUATIONS
CONDUCTED BY OTHER AGENCIES
(E.G., STATE HUMAN RIGHTS AGENCY)

_____ SUA REVIEWS AND ANALYZES AAA
GRANTS/CONTRACT AWARDS

_____ SUA ROUTINELY MONITORS AND ASSESSES
AAA WHICH INCLUDES A REVIEW OF
COMPLIANCE WITH NONDISCRIMINA-
TION GUIDELINES

_____ OTHER (PLEASE SPECIFY) _____

CODES

1 = MONTHLY

2 = QUARTERLY

3 = YEARLY

4 = OTHER (PLEASE
SPECIFY) _____

5 = NEVER

9 =DON'T KNOW

18. What type of information are Area Agencies on Aging (AAAs) required to submit to the State Unit on Aging regarding minority participation in the AAAs' grants/contracts process? (CIRCLE "1" IF AAAs ARE REQUIRED TO SUBMIT THIS INFORMATION. CIRCLE "2" IF THEY ARE NOT. CIRCLE "9" ONLY FOR THOSE ITEMS ABOUT WHICH YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
NUMBER OF MINORITY-OWNED FIRMS/MINORITY ORGANIZATIONS AWARDED GRANTS/CONTRACTS	1	2	9
NUMBER OF MINORITY-OWNED FIRMS/MINORITY ORGANIZATIONS AWARDED SUBGRANTS/SUBCONTRACTS	1	2	9
AMOUNT OF GRANT/CONTRACT MONIES AWARDED TO MINORITY ORGANIZATIONS	1	2	9
AMOUNT OF MINORITY SUBGRANTS/SUB- CONTRACTS FUNDED THROUGH AAA	1	2	9
REASONS FOR REJECTION OF MINORITY- OWNED FIRM APPLICATIONS	1	2	9
OUTREACH EFFORTS TOWARD MINORITY- OWNED FIRMS	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9
NONE	1	2	9

19. Are there written procedures for organizations or firms to file complaints with the State Unit on Aging against the Area Agencies on Aging regarding the grants award/contracting process? CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

THE FOLLOWING ARE QUESTIONS CONCERNING THE SERVICE DELIVERY SYSTEM IN YOUR STATE

STATE UNIT ON AGING MONITORING AND EVALUATION OF AREA AGENCIES ON AGING SERVICE SYSTEMS

20. What standard is used by the State Unit on Aging to determine how older minorities are being served throughout the State? (CIRCLE APPROPRIATE NUMBER.)

1 = WE COMPARE THE PERCENT OF OLDER PERSONS SERVED WHO ARE MINORITIES WITH THE PERCENT OF THE STATE'S MINORITY POPULATION THAT IS OVER 60 YEARS.

2 = WE COMPARE THE PERCENT OF OLDER PERSONS SERVED WHO ARE MINORITY WITH THE PERCENT OF THE STATE'S POPULATION THAT IS MINORITY.

3 = WE COMPARE THE PERCENT OF OLDER PERSONS SERVED WHO ARE MINORITIES WITH THE PERCENT OF THE STATE'S OLDER POPULATION THAT IS MINORITY.

4 = OTHER (PLEASE SPECIFY) _____.

5 = STATE UNIT ON AGING DOES NOT HAVE A STANDARD TO DETERMINE HOW OLDER MINORITIES ARE BEING SERVED.

9 = DON'T KNOW

21. How often are the Area Agencies on Aging's service programs evaluated with regard to whether minorities are being served by these programs? (CIRCLE APPROPRIATE NUMBER.)

1 = ONCE A YEAR

2 = EVERY SIX MONTHS

3 = EVERY THREE MONTHS

4 = MONTHLY

5 = OTHER (PLEASE SPECIFY) _____

6 = NEVER... SKIP TO 23

9 = DON'T KNOW

22. Who conducts the evaluation of the service delivery to older minorities? (CIRCLE APPROPRIATE NUMBER.)

1 = STATE UNIT ON AGING STAFF

2 = REGIONAL/FEDERAL ADMINISTRATION ON AGING STAFF

3 = AREA AGENCY ON AGING STAFF

4 = SERVICE PROVIDERS

5 = OTHER (PLEASE SPECIFY) _____

9 = DON'T KNOW

23. Has any Area Agency on Aging ever been found not to be serving minorities according to the State Unit on Aging's non-discrimination standards? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

24. Using the following list of barriers that have been identified as directly or indirectly inhibiting the full participation of older minorities in social service and nutrition programs, describe the importance of each of these barriers in your State. (USING THE CODES IN THE BOX TO THE RIGHT, PLACE THE NUMBER WHICH BEST DESCRIBES THE IMPORTANCE OF THE IDENTIFIED BARRIER AS IT APPLIES TO MINORITY PARTICIPATION IN YOUR STATE. PLACE A "9" BESIDE A BARRIER IF YOU DO NOT KNOW WHETHER THIS IS A BARRIER TO MINORITY PARTICIPATION IN YOUR STATE.)

- _____ EXISTENCE OF ENGLISH-SPEAKING STAFF ONLY
- _____ LOCATION OF PROGRAMS OUTSIDE OF MINORITY AREAS
- _____ CONTRIBUTIONS FOR MEALS NEEDED FROM PARTICIPANTS
- _____ ADEQUATE TRANSPORTATION NOT PROVIDED TO SERVICE LOCATIONS
- _____ EXISTING SUPPORT SYSTEMS IN MINORITY COMMUNITY NOT UTILIZED
- _____ MINORITY OLDER PERSONS HAVE GENERAL FEELING OF NOT BEING WELCOME IN CERTAIN PROGRAMS
- _____ PROGRAMS HAVE STIGMA OF WELFARE IMAGE
- _____ STAFF LACKS ADEQUATE KNOWLEDGE OF MINORITY LANGUAGE/CULTURAL DIFFERENCES
- _____ SUSPICION OF OLDER MINORITIES OF GOVERNMENT PROGRAMS
- _____ OTHER (PLEASE SPECIFY) _____

CODES	
1 =	VERY LARGE BARRIER TO MINORITY PARTICIPATION
2 =	MODERATE BARRIER TO MINORITY PARTICIPATION
3 =	MINOR BARRIER TO MINORITY PARTICIPATION
4 =	NOT A BARRIER IN THIS THIS STATE
9 =	DON'T KNOW

25. Which of the following types of technical assistance has the State Unit on Aging provided to Area Agencies on Aging/other aging service providers regarding increasing the participation of minority older persons within the last two years? (CIRCLE "1" IF THE SUA PROVIDED THIS TYPE OF TECHNICAL ASSISTANCE. CIRCLE "2" IF IT DID NOT. CIRCLE "9" IF YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
TRAINING ON PROBLEMS AND APPROACHES TO SERVICE DELIVERY USING MINORITY COMMUNITY RESOURCES (E.G., EXISTING FAMILY AND GROUP SUPPORT SYSTEMS)	1	2	9
TRAINING ON INTERPERSONAL SKILL BUILDING AND INTERVIEWING TECHNIQUES TO MINIMIZE CULTURAL AND ETHNIC BARRIERS	1	2	9
HOLDING COMMUNITY FORUMS/TALKS ON THE NEEDS OF OLDER MINORITIES	1	2	9
DESIGNING/USING MINORITY NEEDS ASSESSMENT/PROGRAM EVALUATION INSTRUMENTS	1	2	9
TRAINING OF MINORITY COMMUNITY PEOPLE AS SENIOR ADVOCATES/VOLUNTEERS	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

26. Which of the following types of technical assistance has the State Unit on Aging received from the regional/Federal Administration on Aging offices regarding increasing the participation of older minorities within the last two years. (CIRCLE "1" IF THE TECHNICAL ASSISTANCE RECEIVED INCLUDED THE ITEM. CIRCLE "2" IF IT DID NOT. CIRCLE "9" FOR THOSE ITEMS ABOUT WHICH YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
TRAINING ON PROBLEMS AND APPROACHES TO SERVICE DELIVERY USING MINORITY COMMUNITY RESOURCES (E.G., EXISTING FAMILY AND GROUP SUPPORT SYSTEMS)	1	2	9
TRAINING OF STAFF ON INTERPERSONAL SKILL BUILDING AND INTERVIEWING TECHNIQUES TO MINIMIZE CULTURAL AND ETHNIC BARRIERS	1	2	9
HOLDING COMMUNITY FORUMS/TALKS ON THE NEEDS OF OLDER MINORITIES	1	2	9
DESIGNING/USING MINORITY NEEDS ASSESSMENT/PROGRAM EVALUATION INSTRUMENTS	1	2	9
TRAINING OF MINORITY COMMUNITY PEOPLE AS SENIOR ADVOCATES/VOLUNTEERS	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

27. Have any American Indian tribes or communities in your State applied for grants under Title III of the Older Americans Act? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO... SKIP to 29

8 = NOT APPLICABLE, NO AMERICAN INDIAN TRIBES OR COMMUNITIES IN STATE... SKIP TO 29

9 = DON'T KNOW

28. Have any American Indian tribes or communities in your State been awarded grants for the current fiscal year under Title III of the Older Americans Act? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

8 = NOT APPLICABLE, NO AMERICAN INDIAN TRIBES OR COMMUNITIES
IN STATE

9 = DON'T KNOW

29. CIRCLE "1" FOR EACH TYPE OF PUBLICITY THE STATE UNIT ON AGING (SUA) HAS USED TO MAKE MINORITY OLDER PERSONS AWARE OF THE STATE'S SERVICE PROGRAM AND/OR TO EDUCATE THE GENERAL PUBLIC REGARDING THE NEEDS OF MINORITY ELDERLY. CIRCLE "2" FOR EACH TYPE OF PUBLICITY THE SUA HAS NOT USED. CIRCLE "9" IF YOU DO NOT KNOW ABOUT THE USE OF THE ITEM.

<u>TYPES OF PUBLICITY</u>	<u>ENGLISH</u>			<u>LANGUAGE OTHER THAN ENGLISH</u>		
	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
RECORDED TELEPHONE MESSAGES	1	2	9	1	2	9
POSTERS/DISPLAYS/LEAFLETS IN PUBLIC PLACES (INCLUDE MINORITY ORGANIZATIONS' OFFICES)	1	2	9	1	2	9
ADVERTISEMENT OR ARTICLES IN LOCAL MINORITY NEWS- PAPERS	1	2	9	1	2	9
ADVERTISEMENT OR ARTICLES IN NEWSLETTERS DISTRIBUTED TO LOCAL RESIDENTS/ PARTICIPANTS	1	2	9	1	2	9
PEOPLE SPEAKING AT THE MEETINGS OF CLUBS AND OTHER ORGANIZATIONS	1	2	9	1	2	9
LOCAL RADIO/TELEVISION ANNOUNCEMENTS	1	2	9	1	2	9
ANY OTHER METHOD OF PUBLICITY (PLEASE SPECIFY) _____	1	2	9	1	2	9

30. Is it State Unit on Aging (SUA) policy to provide a translator/bilingual interpreter at all SUA public hearings? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

31. Does the State Unit on Aging translate and publish State plans in languages other than English? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

32. How many of the complaints received during fiscal year 1980 by the State Unit on Aging's long-term care ombudsman program were filed by minorities? (ENTER NUMBER OF COMPLAINTS FILED BY MINORITIES. IF NONE, SKIP TO 35. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

FISCAL YEAR 1980 _ _ _ _

33. How many of the complaints by minorities received during fiscal year 1980 by the State Unit on Aging's long-term care ombudsman program allege racial discrimination and/or denial of equal access to a facility? (ENTER NUMBER OF COMPLAINTS. IF NONE, SKIP TO 35. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

FISCAL YEAR 1980 _ _ _ _

34. How many of the complaints by minorities received by the State Unit on Aging long-term care ombudsman program alleging racial discrimination or denial of equal access were resolved? (ENTER NUMBER OF COMPLAINTS RESOLVED. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

FISCAL YEAR 1980 _ _ _ _

STATE ADVISORY COUNCIL ON AGING

35. ENTER NUMBER OF PERSONS ON THE STATE ADVISORY COUNCIL ON AGING FOR EACH GROUP AND THE TOTAL NUMBER OF MEMBERS ON THE STATE UNIT ON AGING'S ADVISORY COUNCIL. IF YOU DO NOT KNOW, PLEASE ENTER D.K.

<u>GROUP</u>	<u>NUMBER OF ADVISORY COUNCIL</u>
BLACKS (NOT OF HISPANIC ORIGIN)	_____
HISPANICS	_____
ASIAN AND PACIFIC ISLAND AMERICANS	_____
AMERICAN INDIANS/ALASKAN NATIVES	_____
WHITES (NOT OF HISPANIC ORIGIN)	_____
TOTAL NUMBER ON ADVISORY COUNCIL	_____

36. Are any of the following criteria used explicitly by the State Unit on Aging in determining the intrastate funding allocations among Planning and Service Areas (PSAs) in the State? (CIRCLE "1" IF THIS IS A CRITERION FOR FUNDING ALLOCATIONS. CIRCLE "2" IF IT IS NOT. CIRCLE "9" IF YOU DO NOT KNOW WHETHER THIS IS A FUNDING CRITERION. PLEASE ATTACH INTRASTATE FUNDING ALLOCATIONS FORMULA.)

	YES	NO	DON'T KNOW
NUMBER OF PERSONS IN PSA	1	2	9
NUMBER OF MINORITY PERSONS IN PSA	1	2	9
NUMBER OF PERSONS 60 YEARS OR OLDER IN PSA	1	2	9
NUMBER OF MINORITIES 60 YEARS OR OLDER IN PSA	1	2	9
NUMBER OF PERSONS 60 YEARS OR OVER AT OR BELOW POVERTY IN PSA	1	2	9
NUMBER OF MINORITIES 60 YEARS OLDER AT OR BELOW POVERTY IN PSA	1	2	9
AAA's PAST FUNDING OR MINORITY-OWNED FIRMS/ORGANIZATIONS	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

THIS COMPLETES THE SURVEY. THANK YOU FOR YOUR COOPERATION.

PLEASE RETURN THE COMPLETED QUESTIONNAIRE TO:

FRANK KNORR
PROJECT DIRECTOR
U.S. COMMISSION ON CIVIL RIGHTS
1121 VERMONT AVENUE, N.W.
WASHINGTON, D.C. 20425

GPO 877 134

Minority Participation in Federally-Assisted Programs
For Older Persons
AREA AGENCIES ON AGING SURVEY

Prepared by
U.S. COMMISSION ON CIVIL RIGHTS
1121 VERMONT AVENUE, N.W.
WASHINGTON, D.C. 20425

QUESTIONNAIRE# _____

The U.S. Commission on Civil Rights is conducting this survey as a part of a study intended to examine the participation of minorities in federally-assisted programs for older persons. The study and this questionnaire concern the employment, the award of grants/contracts and the participation of minorities as recipients of services in Older Americans Act programs administered by the Administration on Aging (AoA). The questionnaire should be completed by a person or those persons most familiar with each of these three subject areas. Your answers, along with those of other area agencies, will form part of our report to the Congress and the President scheduled for release in fall 1981. ALL RESPONSES TO THE SURVEY ARE CONFIDENTIAL. AT NO TIME WILL THE RESPONSES OF AN INDIVIDUAL AREA AGENCY BE IDENTIFIED.

We appreciate your cooperation in this study since your help is essential in supplying Congress and the President with the information they need to help ensure that all older Americans share in the benefits of Older Americans Act programs.

If you have any question regarding this survey, please telephone Mr. Frank Knorr, Project Director, at (202) 254-6648. For your convenience, a glossary of selected terms used in this survey can be found at the beginning of the questionnaire.

TO INSURE THE CONFIDENTIALITY OF YOUR RESPONSES THE U.S. COMMISSION ON CIVIL RIGHTS WILL REMOVE THIS PAGE UPON RECEIPT OF THE QUESTIONNAIRE.

1. Name of Area Agency on Aging (AAA) _____

2. Address _____

3. City _____ State _____ Zip Code _____

4. Telephone (Include area code) _____

5. Name(s) of persons with overall responsibility for completing

questionnaire:

_____ POSITION _____

_____ POSITION _____

AREA AGENCY ON AGING SURVEY
GLOSSARY

<u>AAA:</u>	Abbreviation for Area Agency on Aging.
<u>AFFIRMATIVE ACTION PLANS:</u>	Goals and/or timetables for minority participation.
<u>Goals:</u>	Action objectives targeting specific racial and ethnic minorities for hiring, promotion and training opportunities who have been underutilized because of past discrimination. Goals are different from quotas.
<u>Timetables:</u>	Specific time periods during which activities are initiated to hire, train and promote racial and ethnic minorities targeted for affirmative action.
<u>AoA</u>	Abbreviation for Administration on Aging.
<u>CLERICALS:</u>	Persons who perform general office work. Includes, for example, file clerks, office machine operators, stenographers, and typists.
<u>COMPLIANCE REVIEWS:</u>	Method for determining whether required standards are met.
<u>D.K.:</u>	Abbreviation for don't know.
<u>EVALUATION:</u>	The formal appraisal and study of the operation of a program.
<u>FULL-TIME:</u>	More than 35 hours of work per week in an agency.
<u>GRANTEE/CONTRACTOR:</u>	Any organization or agency having a State Unit on Aging or AAA contract or grant.
<u>Subgrantee/ Subcontractor:</u>	Any organization or agency having a grant/contract with a prime grantee/contractor or another subcontractor calling for provision of supplies or services required for the performance of a State Unit on Aging or Area Agency on Aging contract/grant.
<u>MINORITIES:</u>	American Indians/Alaskan Natives, Asian and Pacific Island Americans, Blacks and Hispanics.

American Indian or
Alaskan Native:

A person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal affiliation or community recognition.

Asian or Pacific
Island American:

A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands, and Samoa.

Black:

A person having origins in any of the black racial groups of Africa.

Hispanic:

A person of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.

MINORITY ORGANIZATION:

An organization whose board of directors or other like policy-making bodies is at least 50% minority or whose total staff is at least 50% minority group members (as defined above).

MINORITY-OWNED FIRM:

A firm whose sole ownership, or at least 50.1% of whose stock is owned by minorities (as defined above). In a partnership, at least 50% of the interest in the partnership must be controlled by a minority individual.

MONITOR:

To watch, observe or check the operation of a program in an informal or formal way.

MULTIPURPOSE SENIOR
CENTER:

A community or neighborhood facility for the organization and provision of a broad spectrum of services including health, social, nutritional and educational services and a facility for recreational group activity for older persons.

NEEDS ASSESSMENT:

Reasonable and objective method for determining the needs of all eligible residents of a geographic area.

<u>OAA:</u>	Abbreviation for Older Americans Act as amended in 1978.
<u>Title III:</u>	Grants for State and Community Program on Aging.
<u>Title IV-A:</u>	Training Grants.
<u>Title VI:</u>	Grants for Indian Tribes.
<u>OLDER PERSONS:</u>	Those individuals who are 60 years of age or older.
<u>PARAPROFESSIONALS:</u>	Occupations requiring either junior college training or on-the-job training. Term most often applies to job categories in the human services fields, e.g., social services and mental health services. Includes, for example, outreach workers, homemaker aides, and nutrition aides.
<u>PART-TIME:</u>	Less than 35 hours of work per week in an agency.
<u>PROFESSIONALS:</u>	Occupations requiring either college graduation or experience of such a kind and amount as to provide a comparable background. Includes persons who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of an Area Agency on Aging's operations. Includes, for example, program directors, planners, nutritionists, nurses, and social workers.
<u>PSA:</u>	Abbreviation for Planning and Service Area.
<u>SENIOR ADVOCATES:</u>	Persons trained to perform activities to initiate, modify or eliminate public and private policies that have significant impact on the lives of older persons.
<u>SUA:</u>	Abbreviation for State Unit on Aging.
<u>VOLUNTEER:</u>	Person who works two or more hours per week for the agency without pay. This category may include clerical duties or use of special skills in teaching arts and crafts, e.g., pottery making, knitting, and dancing. It does not include persons functioning solely in the capacity of Advisory Council members.

1. Type of Area Agency on Aging. (CIRCLE APPROPRIATE NUMBER AND ATTACH ORGANIZATION CHART.)

01 = COUNCIL ON GOVERNMENTS (COG) REGIONAL PLANNING AND DEVELOPMENT DISTRICT/ECONOMIC DEVELOPMENT DISTRICT

02 = CITY GOVERNMENT

03 = COUNTY GOVERNMENT

04 = CITY/COUNTY GOVERNMENT

05 = STATE GOVERNMENT

06 = PRIVATE, NONPROFIT ORGANIZATION

07 = COMMUNITY COLLEGE/STATE UNIVERSITY

08 = INDIAN PROGRAM/TRIBAL GOVERNMENT

88 = OTHER (PLEASE SPECIFY) _____

99 = DON'T KNOW

2. Please estimate the total current population figures and the composition of the 60 years or older population for your Planning and Service Area: (ENTER NUMBER AND PERCENTAGE FOR EACH GROUP. IF NONE, OR LESS THAN ONE PERCENT, ENTER "0". IF YOU DO NOT HAVE ACCESS TO CURRENT POPULATION FIGURES FOR A GROUP, PLEASE ENTER D.K. FOR DO NOT KNOW.)

GROUP	TOTAL POPULATION	% OF POPULATION	NUMBER OF PERSONS 60 YEARS OR OLDER	% OF 60+ POPULATION
BLACKS (NOT OF HISPANIC ORIGIN)	____,____,____	____	____,____,____	____
HISPANICS	____,____,____	____	____,____,____	____
ASIAN & PACIFIC ISLAND AMERICANS	____,____,____	____	____,____,____	____
AMERICAN INDIANS/ALASKAN NATIVES	____,____,____	____	____,____,____	____
WHITES (NOT OF HISPANIC ORIGIN)	____,____,____	____	____,____,____	____
TOTAL	____,____,____	100%	____,____,____	100%

For what year are these figures? (ENTER YEAR) _____

3. Estimate the percent of persons in your Planning and Service Area 60 years or older that cannot speak or have difficulty communicating in English and who speak one of the following languages as either their usual or their second language? (USING THE CODES IN THE BOX TO THE RIGHT, PLACE THE APPROPRIATE NUMBER FOR THE CORRESPONDING PERCENTAGE NEXT TO EACH LANGUAGE. PLACE A "9" BESIDE A LANGUAGE IF YOU DO NOT KNOW WHAT PERCENT OF THE PSA'S OLDER POPULATION SPEAK THIS LANGUAGE AS THEIR USUAL OR SECOND LANGUAGE.)

LANGUAGES

_____ AMERICAN INDIAN
(PLEASE SPECIFY LANGUAGE) _____

_____ CHINESE

_____ FILIPINO (TAGALOG)

_____ JAPANESE

_____ SPANISH

_____ OTHER
(PLEASE SPECIFY) _____

CODES
1 = LESS THAN 1%
2 = 2 - 5%
3 = 6 - 10%
4 = 11 - 15%
5 = 16 - 25%
6 = 26 - 50%
7 = 51 - 75%
8 = 76 - 100%
9 = DON'T KNOW

THE FOLLOWING ARE QUESTIONS CONCERNING THE EMPLOYMENT AND STAFFING PATTERNS OF THE AREA AGENCY ON AGING (AAA)*

4. Complete the following table for permanent salaried employees who work for the Area Agency on Aging full-time as of January 1, 1981 (i.e., 35 or more hours per week regardless of funding source.) (ENTER THE NUMBER OF PERSONS HOLDING POSITIONS LISTED BELOW FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.) NOTE THAT HORIZONTAL FIGURES FOR EACH JOB CATEGORY SHOULD SUM TO THE TOTAL COLUMN. PLEASE ATTACH COPY OF STAFFING PATTERNS REPORT.

	BLACKS(NOT OF HISPANIC ORIGIN)	HISPANICS	ASIAN AND PACIFIC ISLAND AMERICANS	AMERICAN INDIAN/ ALASKAN NATIVES	WHITES (NOT OF HISPANIC ORIGIN)	TOTAL
AGENCY DIRECTOR	-- --	-- --	-- --	-- --	-- --	-- --
PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
PARA- PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
CLERICALS	-- --	-- --	-- --	-- --	-- --	-- --
OTHER (PLEASE SPECIFY)	-- --	-- --	-- --	-- --	-- --	-- --
Total	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --

5. Complete the following table for permanent salaried employees who work for the Area Agency on Aging part-time as of January 1, 1981 (i.e., less than 35 hours per week regardless of funding source). (ENTER THE NUMBER OF PERSONS HOLDING POSITIONS LISTED BELOW FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.) NOTE THAT HORIZONTAL FIGURES FOR EACH JOB CATEGORY SHOULD SUM TO THE TOTAL COLUMN. PLEASE ATTACH A COPY OF STAFFING PATTERNS REPORT.

	BLACKS(NOT OF HISPANIC ORIGIN)	HISPANICS	ASIAN AND PACIFIC ISLAND AMERICANS	AMERICAN INDIAN/ ALASKAN NATIVES	WHITES (NOT OF HISPANIC ORIGIN)	TOTAL
AGENCY DIRECTOR	-- --	-- --	-- --	-- --	-- --	-- --
PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
PARA- PROFESSIONALS	-- --	-- --	-- --	-- --	-- --	-- --
CLERICALS	-- --	-- --	-- --	-- --	-- --	-- --
OTHER (PLEASE SPECIFY)	-- --	-- --	-- --	-- --	-- --	-- --
Total	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --	-- -- --

*YOU MAY WISH TO REVIEW POSITION DEFINITIONS IN THE GLOSSARY. THOUGH MANY OF AAA STAFF MAY PERFORM VARIOUS DUTIES, EACH EMPLOYEE SHOULD BE ENTERED IN THE POSITION CATEGORY FOR WHICH HIS OR HER MAJOR RESPONSIBILITIES ARE INCLUDED.

6. How many volunteers were on the Area Agency on Aging staff as of January 1, 1981? (ENTER NUMBER FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

<u>GROUP</u>	<u>NUMBER OF VOLUNTEERS ON STAFF</u>
BLACKS (NOT OF HISPANIC ORIGIN)	— — — —
HISPANICS	— — — —
ASIAN AND PACIFIC ISLAND AMERICANS	— — — —
AMERICAN INDIANS/ALASKAN NATIVES	— — — —
WHITES (NOT OF HISPANIC ORIGIN)	— — — —
TOTAL	— — — —

7. Does the Area Agency on Aging (AAA) have staff members who fluently speak any of the following languages in addition to English (i.e., have the ability to converse effortlessly, rapidly and smoothly in the language)? (CIRCLE "1" IF THE AAA STAFF (INCLUDE FULL-TIME, PART-TIME AND VOLUNTEER STAFF) INCLUDES SOMEONE WHO FLUENTLY SPEAKS THE LANGUAGE. CIRCLE "2" IF THE AAA STAFF DOES NOT INCLUDE SOMEONE WHO FLUENTLY SPEAKS THE LANGUAGE. CIRCLE "9" IF YOU DO NOT KNOW.)

<u>LANGUAGE</u>	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
AMERICAN INDIAN (PLEASE SPECIFY LANGUAGE) _____	1	2	9
CHINESE	1	2	9
FILIPINO (TAGALOG)	1	2	9
JAPANESE	1	2	9
SPANISH	1	2	9
OTHER (PLEASE SPECIFY _____)	1	2	9

8. Does the Area Agency on Aging have an affirmative action plan that is currently in effect? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO... SKIP TO 11

9 = DON'T KNOW

9. Does the Area Agency on Aging's (AAA's) affirmative action plan have any of the following requirements? (CIRCLE "1" IF THE AAA'S AFFIRMATIVE ACTION PLAN CONTAINS THE ITEM. CIRCLE "2" IF IT DOES NOT. CIRCLE "9" IF YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
GOALS FOR HIRING MINORITIES*	1	2	9
GOALS AND TIMETABLES FOR HIRING MINORITIES	1	2	9
GOALS FOR PROMOTING MINORITIES	1	2	9
GOALS AND TIMETABLES FOR PROMOTING MINORITIES	1	2	9
GOALS FOR TRAINING MINORITIES	1	2	9
GOALS AND TIMETABLES FOR TRAINING MINORITIES	1	2	9
OTHER (PLEASE SPECIFY)	1	2	9

*FOR THE PURPOSES OF THIS QUESTIONNAIRE, THE WORDS MINORITY AND MINORITIES REFER TO BLACKS, HISPANICS, ASIAN AND PACIFIC ISLAND AMERICANS AND AMERICAN INDIANS/ALASKAN NATIVES.

10. Was the Area Agency on Aging successful in meeting its affirmative action goals for the hiring and promotion of target groups in fiscal years 79 and 80? (CIRCLE APPROPRIATE NUMBERS.)

HIRING		PROMOTION	
<u>FISCAL YEAR (79)</u>	<u>FISCAL YEAR (80)</u>	<u>FISCAL YEAR (79)</u>	<u>FISCAL YEAR (80)</u>
1 = YES	1 = YES	1 = YES	1 = YES
2 = NO	2 = NO	2 = NO	2 = NO
8 = NOT APPLICABLE, NO GOALS SET	8 = NOT APPLICABLE, NO GOALS SET	8 = NOT APPLICABLE, NO GOALS SET	8 = NOT APPLICABLE, NO GOALS SET
9 = DON'T KNOW	9 = DON'T KNOW	9 = DON'T KNOW	9 = DON'T KNOW

THE FOLLOWING ARE QUESTIONS CONCERNING THE AREA AGENCY ON AGING'S CONTRACT SYSTEM

11. Did the Area Agency on Aging award any grants or contracts* during fiscal years 79 or 80? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO... SKIP TO 17

9 = DON'T KNOW

12. How many grants and/or contracts for services were awarded and what was the total amount of monies for grants and contracts awarded by the Area Agency on Aging during fiscal years 79 and 80? (ENTER NUMBER OF GRANTS AND CONTRACTS AND TOTAL DOLLAR AMOUNTS FOR EACH FISCAL YEAR. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

	<u>Number of Grants/ Contracts</u>	<u>Amount of Grants/ Contracts</u>
FISCAL YEAR 79	_____	\$ _____ .
FISCAL YEAR 80	_____	\$ _____ .

13. How many subgrants/subcontracts for services were awarded and what was the total amount of monies for subgrants/subcontracts awarded by the Area Agency on Aging's grantees/contractors during fiscal years 79 and 80? (ENTER NUMBER AND TOTAL DOLLAR AMOUNTS FOR EACH FISCAL YEAR. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

	<u>Number of Subgrants/ Subcontracts</u>	<u>Amount of Subgrants/ Subcontracts</u>
FISCAL YEAR 79	_____	\$ _____ .
FISCAL YEAR 80	_____	\$ _____ .

*FOR THE PURPOSE OF THIS QUESTIONNAIRE, THE TERMS GRANT/CONTRACT REFER TO FUNDS AWARDED BY AN AREA AGENCY ON AGING (AAA) ITSELF; THE TERM SUBGRANT/SUBCONTRACT REFER TO FUNDS AWARDED BY AN AAA'S GRANTEE OR CONTRACTOR.

14. How many service grants/contracts were awarded to minority organizations and what was the total amount of monies awarded to minority organizations by the Area Agency on Aging during fiscal years 79, and 80? (ENTER NUMBER AND TOTAL DOLLAR AMOUNT FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

<u>GROUPS</u>	<u>FISCAL YEAR 79</u>		<u>FISCAL YEAR 80</u>	
	NUMBER OF GRANTS/ CONTRACTS	DOLLAR AMOUNT OF GRANTS/CONTRACTS	NUMBER OF GRANTS/ CONTRACTS	DOLLAR AMOUNT OF GRANTS/CONTRACTS
BLACK (NOT OF HISPANIC ORIGIN)	_____	\$ _____.	_____	\$ _____.
HISPANICS	_____	\$ _____.	_____	\$ _____.
ASIAN AND PACIFIC ISLAND AMERICANS	_____	\$ _____.	_____	\$ _____.
AMERICAN INDIANS/ ALASKAN NATIVES	_____	\$ _____.	_____	\$ _____.
TOTAL MINORITY AWARDS	_____	\$ _____.	_____	\$ _____.

15. How many subgrants/subcontracts were awarded to minority firms/organizations and what was the total amount of subgrant monies awarded to minority firms/organizations by the Area Agency on Aging's grantees/contractors during fiscal years 79, and 80? (ENTER NUMBER AND TOTAL DOLLAR AMOUNTS FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

<u>GROUPS</u>	<u>FISCAL YEAR 79</u>		<u>FISCAL YEAR 80</u>	
	NUMBER OF SUBGRANTS/ SUBCONTRACTS	DOLLAR AMOUNT OF SUBGRANTS/ SUBCONTRACTS	NUMBER OF SUBGRANTS/ SUBCONTRACTS	DOLLAR AMOUNT OF SUBGRANTS/ SUBCONTRACTS
BLACK (NOT OF HISPANIC ORIGIN)	_____	\$ _____.	_____	\$ _____.
HISPANICS	_____	\$ _____.	_____	\$ _____.
ASIAN AND PACIFIC ISLAND AMERICANS	_____	\$ _____.	_____	\$ _____.
AMERICAN INDIANS/ ALASKAN NATIVES	_____	\$ _____.	_____	\$ _____.
TOTAL MINORITY AWARDS	_____	\$ _____.	_____	\$ _____.

16. How many nutrition sites in your Planning and Service Area as of January 1, 1981 were funded by grants/contracts to minority organizations or minority-owned firms? (ENTER NUMBER OF NUTRITION SITES FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

<u>GROUPS</u>	<u>NUMBER OF NUTRITION SITES</u>
BLACKS (NOT OF HISPANIC ORIGIN)	— — —
HISPANICS	— — —
ASIAN AND PACIFIC ISLAND AMERICANS	— — —
AMERICAN INDIANS/ALASKAN NATIVES	— — —
TOTAL MINORITY	— — — —

17. How many formal complaints against the Area Agency on Aging or its grantees were made by older minorities that allege racial discrimination? (ENTER NUMBER. IF NONE, SKIP TO 19. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

FISCAL YEAR 79 — — —

FISCAL YEAR 80 — — —

18. How many of the formal complaints filed against the Area Agency on Aging or its grantees by older minorities alleging racial discrimination were found to be valid? (ENTER NUMBER OF VALID COMPLAINTS. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

FISCAL YEAR 79 — — —

FISCAL YEAR 80 — — —

19. Does the Area Agency on Aging require grantees/contractors to include staffing plans by race and ethnic background in their proposal for funding? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

20. How often are the following done by the Area Agency on Aging (AAA) to determine compliance by individual grantees/contractors with its nondiscrimination guidelines and regulations? (USING THE CODES IN THE BOX TO THE RIGHT, PLACE APPROPRIATE NUMBER BESIDE EACH OF THE LISTED PROCESSES. PLACE A "9" BESIDE A PROCESS IF YOU DO NOT KNOW HOW OFTEN IT IS DONE.)

____ AAA CONDUCTS ON-SITE REVIEWS OF
SELECTED SERVICE FACILITIES FOR
EACH GRANTEE/CONTRACTOR

____ AAA REVIEWS REPORTS SUBMITTED BY
EACH GRANTEE/CONTRACTOR

____ AAA REVIEWS REPORTS OF EVALUATIONS
CONDUCTED BY OTHER AGENCIES
(E.G., STATE HUMAN RIGHTS AGENCY)

____ AAA REVIEWS AND ANALYZES ADHERENCE
TO GRANTS/CONTRACT PROPOSALS

____ AAA ROUTINELY MONITORS AND ASSESSES
GRANTEES/CONTRACTORS WHICH INCLUDES
A REVIEW OF COMPLIANCE WITH NON-
DISCRIMINATION GUIDELINES

____ OTHER (PLEASE SPECIFY) _____

CODES	
1 =	MONTHLY
2 =	QUARTERLY
3 =	YEARLY
4 =	OTHER (PLEASE SPECIFY)
5 =	NEVER
9 =	DON'T KNOW

21. What action has the Area Agency on Aging (AAA) taken when a grantee/contractor failed to comply with AAA nondiscrimination policies? (CIRCLE "1" IF THE AAA TAKES THIS ACTION. CIRCLE "2" IF THE AAA DOES NOT. CIRCLE "9" FOR THOSE ACTIONS ABOUT WHICH YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
NO GRANTEE HAS EVER BEEN FOUND TO BE IN NONCOMPLIANCE	1	2	9
CONTRACTOR WAS BARRED FROM FUTURE CONTRACT	1	2	9
CONTRACTOR DID NOT RECEIVE AN INCREASE IN FUNDS	1	2	9
CONTRACTOR WAS ISSUED A WARNING	1	2	9
CONTRACTOR WAS REQUIRED TO APPEAR BEFORE HEARING BOARD FOR NONCOMPLIANCE	1	2	9
NO ACTION WAS TAKEN	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

22. Who has arbitrated or would arbitrate disputes or appeals of grantees/contractors regarding the Area Agency on Aging's finding of noncompliance with nondiscrimination guidelines? (CIRCLE APPROPRIATE NUMBER.)

1 = AREA AGENCY ON AGING

2 = STATE UNIT ON AGING

3 = REGIONAL/NATIONAL OFFICE OF THE ADMINISTRATION ON AGING

4 = OTHER (PLEASE SPECIFY) _____

9 = DON'T KNOW

THE FOLLOWING ARE QUESTIONS CONCERNING THE SERVICE DELIVERY SYSTEM
IN YOUR PLANNING AND SERVICE AREA (PSA)

PROVISION AND COORDINATION OF SERVICES TO OLDER PERSONS

23. Estimate the breakdown of Area Agency on Aging service participation for fiscal year 80 for your Planning and Service Area for whites and minorities. (ENTER NUMBER (UNDULICATED COUNT) OF SERVICE PARTICIPANTS FOR EACH SERVICE FOR WHITES AND MINORITIES. IF YOU DO NOT KNOW THIS INFORMATION FOR ALL SERVICES, PLEASE FILL IN INFORMATION THAT YOU DO HAVE AND ENTER D.K. FOR THE INFORMATION THAT YOU DO NOT KNOW.)

SERVICE	MINORITIES	WHITES	TOTAL
NUTRITION	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
OUTREACH	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
INFORMATION AND REFERRAL	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
TRANSPORTATION	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
HOMEMAKER/HOME HEALTH AIDE	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
CHORE	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
LEGAL	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
DAYCARE	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
RESIDENTIAL REPAIR	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --
OTHER (PLEASE SPECIFY)	-- -- -- -- --	-- -- -- -- --	-- -- -- -- --

NUTRITION PROGRAMS

24. How many Area Agency on Aging funded nutrition service sites are currently in the Planning and Service Area? (ENTER NUMBER. IF NONE SKIP TO 26. IF YOU DO NOT KNOW, PLEASE ENTER D.K.) _ _ _
25. On the average, approximately how many older persons in your Planning and Service Area are served daily? (ENTER NUMBER FOR EACH GROUP. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

GROUP	CONGREGATE MEALS	HOME DELIVERED MEALS
BLACKS (NOT OF HISPANIC ORIGIN)	-- -- -- -- --	-- -- -- -- --
HISPANICS	-- -- -- -- --	-- -- -- -- --
ASIAN & PACIFIC ISLAND AMERICANS	-- -- -- -- --	-- -- -- -- --
AMERICAN INDIANS/ ALASKAN NATIVES	-- -- -- -- --	-- -- -- -- --
WHITES (NOT OF HISPANIC ORIGIN)	-- -- -- -- --	-- -- -- -- --
TOTAL	-- -- -- -- --	-- -- -- -- --

MULTIPURPOSE SENIOR CITIZENS CENTERS

26. How many multipurpose senior citizens centers (partially or totally funded by the Area Agency on Aging) are there in your Planning and Service Area? (ENTER NUMBER. IF NONE, SKIP TO 28. IF YOU DO NOT KNOW, PLEASE ENTER D.K.) _ _ _ _
27. How many of the AAA funded multipurpose senior citizen centers that are in your Planning and Service Area are utilized primarily (greater than 50%) by minority older persons? (ENTER NUMBER OF CENTERS. IF YOU DO NOT KNOW, PLEASE ENTER D.K.)

<u>GROUPS</u>	<u>NUMBER OF CENTERS</u>
BLACKS (NOT OF HISPANIC ORIGIN)	_ _ _
HISPANICS	_ _ _
ASIAN AND PACIFIC ISLAND AMERICANS	_ _ _
AMERICAN INDIANS/ALASKAN NATIVES	_ _ _

28. CIRCLE "1" FOR EACH OF THE FOLLOWING LANGUAGES, OTHER THAN ENGLISH, FOR WHICH AN INFORMATION AND REFERRAL SERVICE IS AVAILABLE IN THAT LANGUAGE IN YOUR PLANNING AND SERVICE AREA (PSA). CIRCLE "2" FOR EACH LANGUAGE FOR WHICH AN INFORMATION AND REFERRAL SERVICE IS NOT AVAILABLE IN YOUR PSA. CIRCLE "9" FOR THOSE LANGUAGES ABOUT WHICH YOU DO NOT KNOW.

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
AMERICAN INDIAN (PLEASE SPECIFY LANGUAGE _____)	1	2	9
CHINESE	1	2	9
FILIPINO (TAGALOG)	1	2	9
JAPANESE	1	2	9
SPANISH	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

29. CIRCLE "1" FOR EACH TYPE OF PUBLICITY THE AREA AGENCY ON AGING OR ITS GRANTEES HAS USED TO MAKE MINORITY OLDER PERSONS AWARE OF THE SERVICE PROGRAM. CIRCLE "2" FOR EACH TYPE OF PUBLICITY THAT HAS NOT BEEN USED. CIRCLE "9" FOR THOSE ITEMS ABOUT WHICH YOU DO NOT KNOW.

	<u>ENGLISH</u>			<u>LANGUAGE OTHER THAN ENGLISH</u>		
	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
RECORDED TELEPHONE MESSAGES	1	2	9	1	2	9
POSTERS/DISPLAYS/LEAFLETS IN PUBLIC PLACES (INCLUDE MINORITY ORGANIZATIONS/OFFICES)	1	2	9	1	2	9
ADVERTISEMENT OR ARTICLES IN LOCAL MINORITY NEWSPAPERS	1	2	9	1	2	9
ADVERTISEMENT OR ARTICLES IN NEWSLETTERS DISTRIBUTED TO LOCAL RESIDENTS/PARTICIPANTS	1	2	9	1	2	9
PEOPLE SPEAKING AT THE MEETING OF CLUBS AND OTHER ORGANIZATIONS	1	2	9	1	2	9
LOCAL RADIO/TELEVISION ANNOUNCEMENTS	1	2	9	1	2	9
ANY OTHER METHOD OF PUBLICITY? (PLEASE SPECIFY) _____	1	2	9	1	2	9

30. Using the following list of barriers that have been identified as directly or indirectly inhibiting the full participation of minority older persons in social service and nutrition programs, describe the importance of each of these barriers in your Planning and Service Area (PSA). (USING THE CODES IN THE BOX TO THE RIGHT, PLACE THE NUMBER WHICH BEST DESCRIBES THE IMPORTANCE OF THE IDENTIFIED BARRIER AS IT APPLIES TO MINORITY PARTICIPATION IN YOUR PSA. PLACE A "9" BESIDE A BARRIER IF YOU DO NOT KNOW WHETHER THIS IS A BARRIER TO MINORITY PARTICIPATION IN YOUR PSA.)

_____ EXISTENCE OF ENGLISH-SPEAKING STAFF ONLY

_____ LOCATION OF PROGRAMS OUTSIDE OF MINORITY AREAS

_____ CONTRIBUTIONS FOR MEALS NEEDED FROM PARTICIPANTS

_____ ADEQUATE TRANSPORTATION NOT PROVIDED TO SERVICE LOCATIONS

_____ EXISTING SUPPORT SYSTEMS IN MINORITY COMMUNITY NOT UTILIZED

_____ MINORITY OLDER PERSONS HAVE GENERAL FEELING OF NOT BEING WELCOME IN CERTAIN PROGRAMS

_____ PROGRAMS HAVE STIGMA OF WELFARE IMAGE

_____ STAFF LACKS ADEQUATE KNOWLEDGE OF MINORITY LANGUAGE/CULTURAL DIFFERENCES

_____ SUSPICION OF MINORITY OLDER PERSONS OF GOVERNMENT PROGRAMS

_____ OTHER (PLEASE SPECIFY) _____

CODES

1 = VERY LARGE BARRIER TO MINORITY PARTICIPATION

2 = MODERATE BARRIER TO MINORITY PARTICIPATION

3 = MINOR BARRIER TO MINORITY PARTICIPATION

4 = NOT A BARRIER IN THIS PSA

9 = DON'T KNOW

AREA AGENCY ON AGING ADVISORY COUNCIL ON AGING

31. ENTER NUMBER OF PERSONS ON AREA AGENCY ON AGING (AAA) ADVISORY COUNCIL ON AGING FOR EACH GROUP AND THE TOTAL NUMBER OF MEMBERS ON THE AAA ADVISORY COUNCIL. IF YOU DO NOT KNOW, PLEASE ENTER D.K.

<u>GROUPS</u>	<u>NUMBER ON ADVISORY COUNCIL</u>
BLACKS (NOT OF HISPANIC ORIGIN)	— — —
HISPANICS	— — —
ASIAN AND PACIFIC ISLAND AMERICANS	— — —
AMERICAN INDIAN/ALASKAN NATIVES	— — —
WHITES (NOT OF HISPANIC ORIGIN)	— — —
TOTAL NUMBER ON ADVISORY COUNCIL	— — — —

AAA MONITORING AND EVALUATION OF THE SERVICE SYSTEM

32. What standard is used by the Area Agency on Aging to determine how minority older persons are being served throughout the Planning and Service Area (PSA)? (CIRCLE APPROPRIATE NUMBER.)

1 = WE COMPARE THE PERCENT OF OLDER PERSONS SERVED WHO ARE MINORITIES WITH THE PERCENT OF THE PSA'S MINORITY POPULATION THAT IS OVER 60 YEARS.

2 = WE COMPARE THE PERCENT OF OLDER PERSONS SERVED WHO ARE MINORITY WITH THE PERCENT OF THE PSA'S POPULATION THAT IS MINORITY.

3 = WE COMPARE THE PERCENT OF OLDER PERSONS SERVED WHO ARE MINORITIES WITH THE PERCENT OF THE PSA'S POPULATION OVER 60 YEARS THAT IS MINORITY.

4 = OTHER (PLEASE SPECIFY) _____

5 = AREA AGENCY ON AGING DOES NOT HAVE A STANDARD TO DETERMINE HOW MINORITY PERSONS ARE BEING SERVED.

9 = DON'T KNOW

33. How often are the Area Agency on Aging's service programs evaluated with regard to whether minorities are being served by these programs? (CIRCLE APPROPRIATE NUMBER.)

1 = ONCE A YEAR

2 = EVERY SIX MONTHS

3 = EVERY THREE MONTHS

4 = MONTHLY

5 = OTHER (PLEASE SPECIFY) _____

6 = NEVER... SKIP TO 35

9 = DON'T KNOW

34. Who conducts the evaluation of the service delivery to minority older persons? (CIRCLE APPROPRIATE NUMBER.)

1 = AREA AGENCY ON AGING STAFF

2 = STATE UNIT ON AGING STAFF

3 = SERVICE PROVIDERS

4 = OTHER (PLEASE SPECIFY) _____

9 = DON'T KNOW

35. When was the last time the Area Agency on Aging's (AAA's) program was evaluated by the State Unit on Aging with regard to whether the AAA was serving minority older persons in proportion to the number of minorities in the Planning and Service Area? (CIRCLE APPROPRIATE NUMBER.)

1 = LESS THAN 6 MONTHS AGO

2 = 6 MONTHS - 1 YEAR

3 = 1 - 2 YEARS

4 = 2 - 3 YEARS

5 = OVER 3 YEARS

6 = NEVER

9 = DON'T KNOW

36. If the Area Agency on Aging (AAA) sets goals for increasing the participation of older minorities in its fiscal years' 79 and 80 area plans, how successful was the AAA in meeting the goals that it set? (CIRCLE APPROPRIATE NUMBER.)

FISCAL YEAR 79

- 1 = GOALS WERE FULLY MET
2 = GOALS WERE PARTIALLY MET
3 = GOALS WERE NOT MET AT ALL
8 = NOT APPLICABLE, DID NOT SET THESE GOALS
9 = DON'T KNOW

FISCAL YEAR 80

- 1 = GOALS WERE FULLY MET
2 = GOALS WERE PARTIALLY MET
3 = GOALS WERE NOT MET AT ALL
8 = NOT APPLICABLE, DID NOT SET THESE GOALS
9 = DON'T KNOW

37. Which of the following types of technical assistance has the Area Agency on Aging provided to its grantees/other aging service providers within the last two years regarding increasing the participation of minority older persons? (CIRCLE "1" IF THE AREA AGENCY ON AGING PROVIDED THIS TYPE OF TECHNICAL ASSISTANCE. CIRCLE "2" IF IT DID NOT. CIRCLE "9" IF YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
TRAINING ON PROBLEMS AND APPROACHES TO SERVICE DELIVERY USING MINORITY COMMUNITY RESOURCES (E.G., EXISTING FAMILY AND GROUP SUPPORT SYSTEMS)	1	2	9
TRAINING ON INTERPERSONAL SKILL BUILDING AND INTERVIEWING TECHNIQUES TO MINIMIZE CULTURAL AND ETHNIC BARRIERS	1	2	9
HOLDING COMMUNITY FORUMS/TALKS ON THE NEEDS OF OLDER MINORITIES	1	2	9
DESIGNING/USING MINORITY NEEDS ASSESSMENT/PROGRAM EVALUATION INSTRUMENTS	1	2	9
TALKS WITH REPRESENTATIVES OF MINORITY ORGANIZATIONS IN PSA (E.G., TRIBAL GOVERNMENTS, LULAC, URBAN LEAGUE)	1	2	9
TRAINING OF MINORITY COMMUNITY PEOPLE AS SENIOR ADVOCATES	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

38. Which of the following types of technical assistance has the Area Agency on Aging received from the State Unit on Aging within the last two years regarding increasing the participation of minority older persons? (CIRCLE "1" IF THE TECHNICAL ASSISTANCE RECEIVED INCLUDED THE FOLLOWING. CIRCLE "2" IF IT DID NOT. CIRCLE "9" IF YOU DO NOT KNOW.)

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
TRAINING ON PROBLEMS AND APPROACHES TO SERVICE DELIVERY USING MINORITY COMMUNITY RESOURCES (E.G., EXISTING FAMILY AND GROUP SUPPORT SYSTEMS)	1	2	9
TRAINING ON INTERPERSONAL SKILL BUILDING AND INTERVIEWING TECHNIQUES TO MINIMIZE CULTURAL AND ETHNIC BARRIERS	1	2	9
HOLDING COMMUNITY FORUMS/TALKS ON THE NEEDS OF OLDER MINORITIES	1	2	9
DESIGNING/USING MINORITY NEEDS ASSESSMENT/PROGRAM EVALUATION INSTRUMENTS	1	2	9
TRAINING OF MINORITY COMMUNITY PEOPLE AS SENIOR ADVOCATES	1	2	9
OTHER (PLEASE SPECIFY) _____	1	2	9

39. Is it an Area Agency on Aging (AAA) policy to provide a translator/bilingual interpreter at all AAA public hearings? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

40. Does the Area Agency on Aging translate and publish all area plans in a language other than English? (CIRCLE APPROPRIATE NUMBER.)

1 = YES

2 = NO

9 = DON'T KNOW

THIS COMPLETES THE SURVEY. THANK YOU FOR YOUR COOPERATION.

Please return the completed questionnaire to:

Mr. Frank Knorr
Project Director
U.S. Commission on Civil Rights
1121 Vermont Avenue, N.W.
Washington, D.C. 20425

GPO 877 213